

Dr. Stewart Lucas Murrey
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SocialMedia: sickoscoop.com/lucas

Plaintiff & Plaintiff In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STANELY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an individual;)	Case No. 23STCV14890
)	
Plaintiff,)	DECLARATION OF PLAINTIFF DR.
)	MURREY IN SUPPORT OF PLAINTIFF'S
)	OPPOSITION TO DEFENDANT VANESSA
Vs.)	VALDES' ANTI-SLAPP MOTION TO
)	STRIKE COMPLAINT AND REQUEST
)	FOR SANCTIONS
Kelly Gibbons a.k.a. Kel Culb Gib, an individual; Liv Burger, an individual; Elly Shariat, an individual; Ainka Wiz, an individual; Anonymous Group Member 1, an individual; Amy Blalock, an individual; Vanessa Valdes, an individual; Lena Vanderford, an individual; Michal Ofek, an individual; Kelyn Rodriguez, an individual; and DOES 1 through 50, inclusive;)	Date: 27 March 2024
)	Time: 10:00 a.m.
)	Dept.: 61
)	Complaint Filed: 27 June 2023
)	Hon. Gregory Keosian
Defendants)	

I, Dr. Stewart Lucas Murrey, declare as follows:

1. That I am the plaintiff in this action; that I am over the age of 18 years and that I have personal knowledge of the facts contained in this declaration. If called upon to testify I could and would testify competently as to the truth of the facts stated herein.

- 1 2. I received my Doctorate of Philosophy (Ph.D) from Yale University in 2011, I have since
2 published various books and articles on the origins of money and tragedy; I am presently
3 working on new material while I continue to join my voice to peaceful protests supporting
4 civil rights for all peoples everywhere. Based upon these achievements I use the title doctor in
5 front of my name.
6
- 7 3. This declaration is submitted in support of plaintiff's opposition to defendant Vanessa Valdes'
8 anti-SLAPP motion to strike complaint and plaintiff's request for sanctions against Valdes.
9
- 10 4. Seeking to socialize, I matched with Valdes on Hinge on 28 December 2019. However, I
11 recalled having matched with her before and that she previously acted erratic and aggressive. I
12 sent her a text message wherein I stated: "I'm amused by how you'll mess it up. Wait you
13 already did."
14
- 15 5. A true and correct copy of said text message exchange with Valdes is hereto attached as
16 Exhibit 1.
17
- 18 6. As I recollected the previous negative experience with Valdes, my gut told me to distance
19 myself from her quickly. I made a comment stating that it was "fun watching [Valdes] burn"
20 her second chance to connect with me, but I "wish[ed her] well in [her] search" and I even
21 wished Valdes "good luck".
22
- 23 7. A true and correct copy of said text message exchange with Valdes is hereto attached as
24 Exhibit 2.
25
- 26 8. Because Valdes continued to engage me by typing on said platform app, I made a joke about
27 her previously reckless references to my credentials and how sometimes women
28 presumptuously bring their pets on dates. Valdes then disproportionately responded: "Listen,

1 Lucas Murrey. You're fucking with the wrong woman. I'm reporting your ass. Stay away
2 from women and get help."

3 9. A true and correct copy of said text message exchange with Valdes is hereto attached as
4 Exhibit 3.

5
6 10. As I did not know, nor have any real interest in Valdes I moved on with my life.

7 11. Valdes made many outside attacks on me and took part in group harassment through a
8 Facebook page that functioned as a bashing-site of men. Valdes stated, among many other
9 comments: "How has this guy not been removed from dating apps and arrested already?!?! I
10 matched with him a couple years ago and received the most BIZARRE and threatening
11 messages from him! It was so weird and scary that I even reported him to Hinge support, but
12 never knew if anything was done about him... He needs to be stopped!"

13
14 12. A true and correct copy of Valdes' posting is hereto attached as Exhibit 4.

15 13. Instead of ceasing, Valdes has doubled down on her narrative that I was "scary" when all I
16 obviously wanted was to remove Valdes away from me. Since then, Valdes has slandered me
17 on national TV and gone online to write, "We are a collective of female Defendants who are
18 being sued by one male Plaintiff. He has named 50+ defendants in total..." which is on its
19 face, false, and has successfully incited a barrage of feedback from around the world.
20 Claiming that the group is sharing "truthful accounts of our personal experiences", she and
21 others display a fabricated story about me. In this story, another defendant: Elly Shariat stated
22 that I somehow matched with her, followed her to a hotel where she was dining and grabbed
23 her wrist. I do not know who Elly Shariat is. This lunatic and impossible story is completely
24 fabricated. Even after being noticed that this was in fact completely fabricated, Valdes and co-
25 authors posted this lie on their GoFundMe, spreading it on international TV, and social media
26
27
28

1 to harm my reputation, credibility, and life. They state that I am a “legitimate danger”,
2 implying that Valdes knows of criminal acts that nobody is aware of, and stating: “We plan to
3 finally put an end to his harassing ways once and for all” which is blatantly unfounded.
4 Again, I knew nothing of most of these defendants and never so much as reached out to them
5 while they stalked and harassed me for over a year. Valdes goes on to write: “Rather, we were
6 coming together to share truthful accounts of our personal experiences... Our negative
7 interactions with him have spanned years.” I have never met 9 out of the 10 defendants and
8 have only talked to 3 of them very briefly only through text messages. In every interaction,
9 nothing warranted such false light and I will be able to prove this with documents.
10

11
12 14. A true and correct copy of said media assaults and Valdes et al.’s GoFundMe libel is hereto
13 attached as Exhibit 5.

14 15. Sometime in 2022 or early 2023 (Facebook does not provide dates) Valdes and other
15 Facebook members posted a collage of pictures of me without my consent and under the
16 following statements: “Public records show: [plaintiff] [h]as domestic violence charges filed
17 against him”; “plus involvement in MURDER case of his ex[-]wife whom he had life
18 insurance benefits from”; that plaintiff has [f]iled 11 court cases against women in 33 months
19 trying to extort money from them”; “[he] [h]as filed and been denied several restraining
20 orders”; [he] [h]as acted aggressively in court”; “[h]e’s on Tinder. DON’T DATE. Seriously
21 the only time in my life that I’ve been scared of a man was the week following this date.”
22

23
24 16. A true and correct copy of the above-noted post is hereto attached as Exhibit 6.

25 17. All of these statements are false. I have never been charged, much less convicted of any crime
26 my entire life. I have never been married. I had a girlfriend with a great spirit, but who passed
27 unfortunately from cancer in March of 2018. I did receive some insurance benefits, but along
28

1 with several other persons some of whom received more money than myself. The suggestion
2 that I was involved in the murder of someone I loved and for whom I cared is despicable. I
3 have not filed said amount of court cases against women in said time trying to extort them,
4 nor anyone else. I have never litigated frivolously, including any and all restraining orders I
5 have sought. I have never acted aggressively in court.
6

7 18. Valdes also made several postings about me on Facebook and countless other platforms
8 wherein she severely misconstrued and lied about her brief online experience with me
9 wherein Valdes falsely states that I said to her that I wanted to watch her burn to death.

10 19. A true and correct copy of Valdes' misconstruing of her brief online experience with me is
11 attached hereto as Exhibit 7.
12

13 20. Valdes continued to defame me when she stated to defendant Lena Vanderford that "[h]e is
14 truly dangerous".

15 21. A true and correct copy of Valdes' defamatory statement is hereto attached as Exhibit 8.

16 22. That Valdes meant "dangerous" because she is saying that plaintiff has committed serious
17 crimes like "murder" is reinforced with she screams in all caps that plaintiff needs to be
18 "ARRESTED" immediately.
19

20 23. A true and correct copy of Valdes' inflammatory and defamatory statement is hereto attached
21 as Exhibit 9.

22 24. Valdes participates in gang-stalking and cyberbullying of me behind a front that she is
23 protecting all women everywhere. She promotes her own and other false statements about me
24 such as those made by defendants Elly Shariat, Kelly Gibbons, Liv Burger et. al. to "cancel"
25 me on every mainstream platform on the Internet.
26
27
28

- 1 25. A true and correct copy of excerpts of Valdes' gang-stalking and cyberbullying of me behind
2 a front of protecting all women is hereto attached as Exhibit 10.
- 3 26. A true and correct copy of excerpts of Valdes deleting her comments and responding to
4 comments that have been deleted is hereto attached as Exhibit 11.
- 5 27. A true and correct copy of excerpts of Valdes posting anonymously and supporting other
6 Facebook criminals who post anonymously is hereto attached as Exhibit 12.
- 7 28. Valdes and countless others including Paola Sanchez use the mafia sign of the "black hand" to
8 celebrate their online murder of my identity. This is same "black hand" symbol that can be
9 traced back to the Italian mafia that joined forces with office of strategic services ("OSS")
10 during the second world war and has, by now, become a front for the Jewish mafia controlling
11 nation-states with sexual blackmail on the order of Jeffrey Epstein, Ghislaine Maxwell,
12 Robert Maxwell and Lesley Wexner.
- 13 29. A true and correct copy of excerpts of said mafia sign of the "black hand" that Valdes and
14 other Facebook criminals use to celebrate their online murder of plaintiff and others and
15 which is associated with some of the most heinous mafia savagery of present day is hereto
16 attached as Exhibit 13.
- 17 30. Recently Valdes et al. slandered me on mainstream new shows across the nation by falsely
18 saying that I am "suing fifty (50) women". I am not suing 50 women and this slander has
19 incited hatred against me for my alleged reckless targeting of women and I have received
20 death threats.
- 21 31. A true and correct copy of excerpts of Valdes, Burger et al. on mainstream news outlets
22 slandering me is hereto attached as Exhibit 14.
- 23
24
25
26
27
28

- 1 32. Valdes, Burger et al. made the same defamatory statement that I am “suing 50 women” on
2 their online GoFundMe.com donation webpage. Here said defamation occurs just above
3 Shariat’s defamatory statements alleging that I harassed her all of which are pure fiction and
4 in truth and actual fact never occurred as well as a derogatory representation of my private
5 text messages, thus representing yet another instance of Valdes et al. harassing me and
6 invading my privacy.
7
- 8 33. A true and correct copy of excerpts of the GoFundMe.com webpage of Valdes, Burger et al. is
9 hereto attached as Exhibit 15.
- 10 34. Because of this recent and ongoing defamation, now both libel and slander, I have received
11 and/or witnessed countless harassing messages on social media as well as death threats.
12
- 13 35. A true and correct copy of excerpts of recent death threats is hereto attached as Exhibit 16.
- 14 36. A true and correct copy of excerpts of said Facebook co-conspirators harassing men who are
15 deceased and the families of men who simply preferred to not have a one-night stand with
16 them is hereto attached as Exhibit 17.
- 17 37. A true and correct copy of excerpts of Valdes’ Facebook account and AWDTSF accounts, her
18 deleting of critical information and the hundreds of Facebook “points” Valdes has earned is
19 hereto attached as Exhibit 18.
20
- 21 38. After obtaining evidence of Valdes inflammatory and defamatory statements I sought to join
22 said AWDTSF Facebook groups to exercise my right to free speech to defend myself.
23 Specifically, I sought to join said Facebook groups since at least 26 February 2023. Since then
24 I have tried again and again. For instance, I tried to join said forums again on 28 February
25 2023 and even most recently on 22 March 2024. Each time Valdes and/or an anonymous
26
27
28

Facebook moderator and/or administrator refused to allow me to join said groups and thus denied me his right to free speech to defend myself.

39. A true and correct copy of excerpts my diligent and good faith attempts to join said Facebook groups and the denials of my right to free speech to defend myself is hereto attached as Exhibit 19.

40. A true and correct copy of relevant form and special interrogatories and requests for admission and production of documents served on Valdes on 2 January 2024 is hereto attached as Exhibit 20.

41. Because Valdes failed to respond, plaintiff served Valdes with a meet & confer letter on 7 February 2024 informing Valdes that she had waived all her objections and that she had to provide complete and thorough responses forthwith or plaintiff will file a motion to compel seeking any and all sanctions (Decl. plaintiff Dr. Murrey ¶¶ 42-43, Exh. "21"). Thereafter Valdes filed her suspicious and frivolous motion.

42. A true and correct copy of excerpts my diligent and good faith attempts to join said Facebook groups and the denials of my right to free speech to defend myself is hereto attached as Exhibit 19.

//

//

//

1 43. Valdes failed to give notice and serve me with her anti-SLAPP motion to strike.

2
3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct.

5 Executed on 25 March 2024 at Los Angeles, California.

6
7 /s/ Stewart Lucas Murrey
8 Dr. Stewart Lucas Murrey, Declarant
9 Plaintiff & Plaintiff in Pro Per
10 1217 Wilshire Blvd. # 3655
11 Santa Monica, CA 90403
12 Tel.: (424) 278-3017
13 Email: 2@lucasmurrey.io
14 Website: lucasmurrey.com
15 SocialMedia: sickoscoop.com/lucas
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EXHIBIT 1

12:34



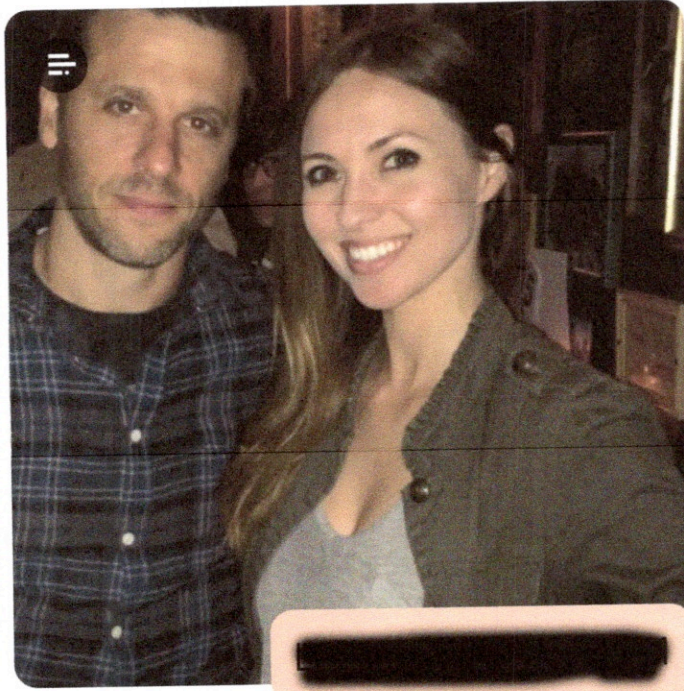
Vanessa



Chat

Profile

Yesterday, 9:11 PM



Yesterday, 9:11 PM



Bold move :)

I'm amused by how you'll mess it up

Wait you already did

Why is there a guy in your pic genius?

I'm amused by how you think you know me well enough to talk to me like one of your buddies

Send a message

Send

EXHIBIT 2

12:34



Vanessa



Chat

Profile

I'm amused by how you think you know me well enough to talk to me like one of your buddies.



Read my caption, genius.

Nobody reads captions moron

But it's fun watching you burn lol

Listen I wish you well in your search
good luck

EXHIBIT 3

I know my credentials are hardly worthy of you much less my looks but can you please have your pet get it's hair all over my nice cloths?

Today, 12:29 AM



Listen, Lucas Murrey. You're fucking with the wrong woman. I'm reporting your ass. Stay away from women and get help.

Good Vanessa Loser I'm subpoenaing you're idiot "report" and possibly suing you for defamation

Sent

Send a message

Send

EXHIBIT 4



Kari Woodring Webster

Wow. Talk about going down a rabbit hole. His Twitter makes him look insane and all the court cases. Wow

Like Reply 31w



↳ 3 Replies



Liv Burger

Be aware, he's still active on tinder. Just reported him

...

Like Reply 23w



↳ 6 Replies



Vanessa Valdes

HOW HAS THIS GUY NOT BEEN REMOVED FROM DATING APPS AND ARRESTED ALREADY?!?!?

I matched with him a couple years ago and received the most BIZARRE and threatening messages from him! It was so weird and scary that I even reported him to Hinge support, but never knew if anything was done about him. APPARENTLY NOT!! I'm so disgusted to see all these horrible testimonials about him, because it means he gets away with everything. He needs to be stopped!! Pics in comments below...

Like Reply 9w



↳ 16 Replies



Kel Culb Gib Author

UPDATE: REPORTED AND REMOVED FROM HINGE.

But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there. if

EXHIBIT 5

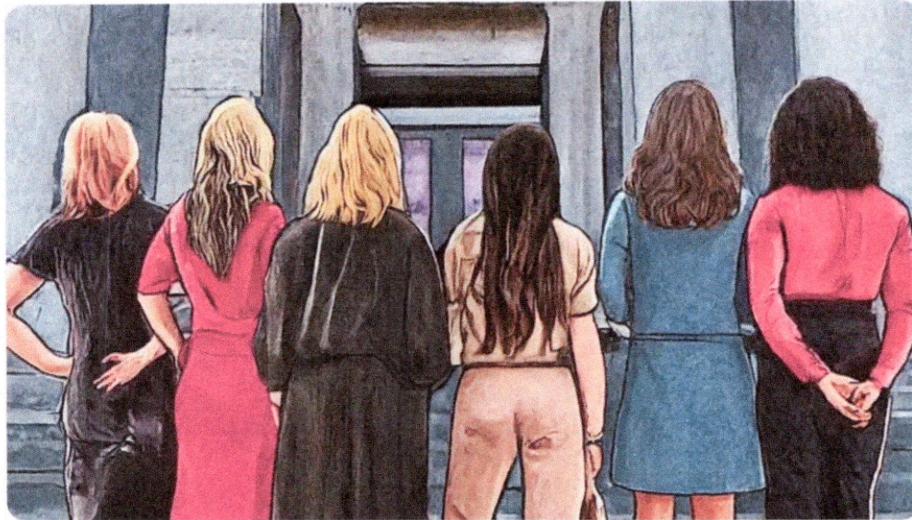
5:20



Facebook
www.gofundme.com



gofundme



Legal Fund for the Women of AWDTSG LOS ANGELES

\$1,345 raised of \$30,000 goal • 41 donations

Donate now



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Facebook



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Text



More



Anonymous Defendant is organizing this fundraiser.





Anonymous Defendant is organizing this fundraiser.



Donation protected

Hi there, thanks for taking the time to read this account of what has been our unfortunate reality over the past several months.

We are a collective of **female Defendants** who are being sued by one male Plaintiff. He has named 50+ defendants in total but is targeting a smaller core group. The Plaintiff brings forward claims of “*defamation*”, “*libel*”, “*civil conspiracy*”, “*gender violence*”, “*invasion of privacy*” etc.

This is not the first lawsuit in which this Plaintiff is making these claims.

Our lawsuit :

Case #23STCV14890,

Filed June 2023 in Los Angeles

The basis of his complaint is centered around a post that we commented on in the Facebook group ‘*Are We Datina The Same Guv. Los*

Share

Donate

Our lawsuit :**Case #23STCV14890,**

Filed June 2023 in Los Angeles

The basis of his complaint is centered around a post that we commented on in the Facebook group '*Are We Dating The Same Guy, Los Angeles*'. This post referenced him based on many **true** and negative experiences with him.

Due to this Facebook post, he is currently claiming damages amounting to the total of **\$2,600,000** for "*emotional distress*", "*pain and suffering*", "*medical expenses*", "*future medical expenses*" and "*punitive damages*".

To our knowledge, the AWDTSF FB groups were made with the intent of keeping women safe while dating by allowing them to share their dating experiences with others. In this group, it is customary to post warnings of unsavory interactions with men, as well as screenshots of those men's public photos and communications.

As you may know, there was a case filed and dismissed recently in Chicago.

Our case is completely separate, having been filed months prior by a different Plaintiff.

Share**Donate**

As you may know, there was a case filed and dismissed recently in Chicago.

Our case is completely separate, having been filed months prior by a different Plaintiff.

Likewise, this GFM is **not** tied to the Chicago case in any way, nor have we received any funds from that campaign.

Among our comments regarding the LA Plaintiff were various safety concerns. There were many firsthand accounts of **odd, scary and unsettling interactions** with the Plaintiff, including screenshots detailing those interactions.

He filed this suit in June of 2023, and failed to begin “serving” any of us with his complaint until November of 2023.

He has shown up / attempted to serve us at many of our workplaces and homes, often late at night, despite never having met most of us.

Since November, we have been forced to take valuable time out of our day-to-day lives to deal with this matter. We’re now seeking to hire suitable legal representation as our **first hearing date of March 20th, 2024** quickly approaches.

After consulting with various law firms on cost,

Share

Donate

After consulting with various law firms on cost, we've decided to set our initial goal to 30k.

We would like to make it very clear that this was **NOT** a sour post in reaction to our being "rejected" by the Plaintiff as he so claims. Rather, we were coming together to share **truthful** accounts of our personal experiences. These included **valid** concerns pertaining to the Plaintiff's unsettling behavior and background, all of which is public information.

To wrap this up, it is our *opinion* that this Plaintiff poses a **legitimate danger** to the women of Los Angeles. Our negative interactions with him have spanned years. We plan to finally put an end to his harassing ways once and for all, and we need your help to do it.

Any leftover funds will be *transparently* donated to other women forced to defend themselves in similar future cases. Rest assured, we will keep you updated every step of the way as we proudly and unwaveringly defend our **truth**.

We truly appreciate any and all help you're able to give. If you're unable to contribute financially, please consider sharing this fundraiser where you can.

[Share](#)[Donate](#)



We truly appreciate any and all help you're able to give. If you're unable to contribute financially, please consider sharing this fundraiser where you can.

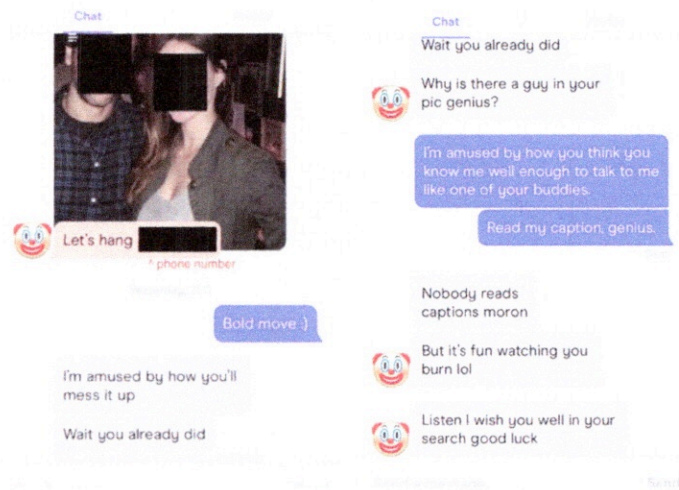
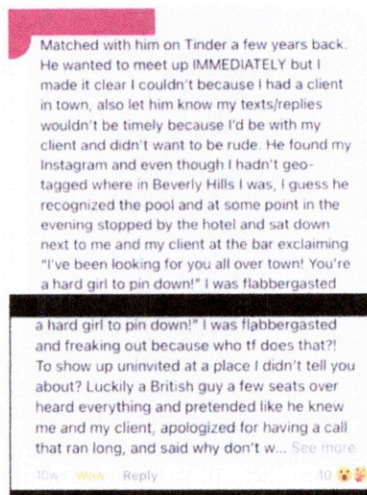
Any contact with us can be made via the "contact" button at the bottom of this page.

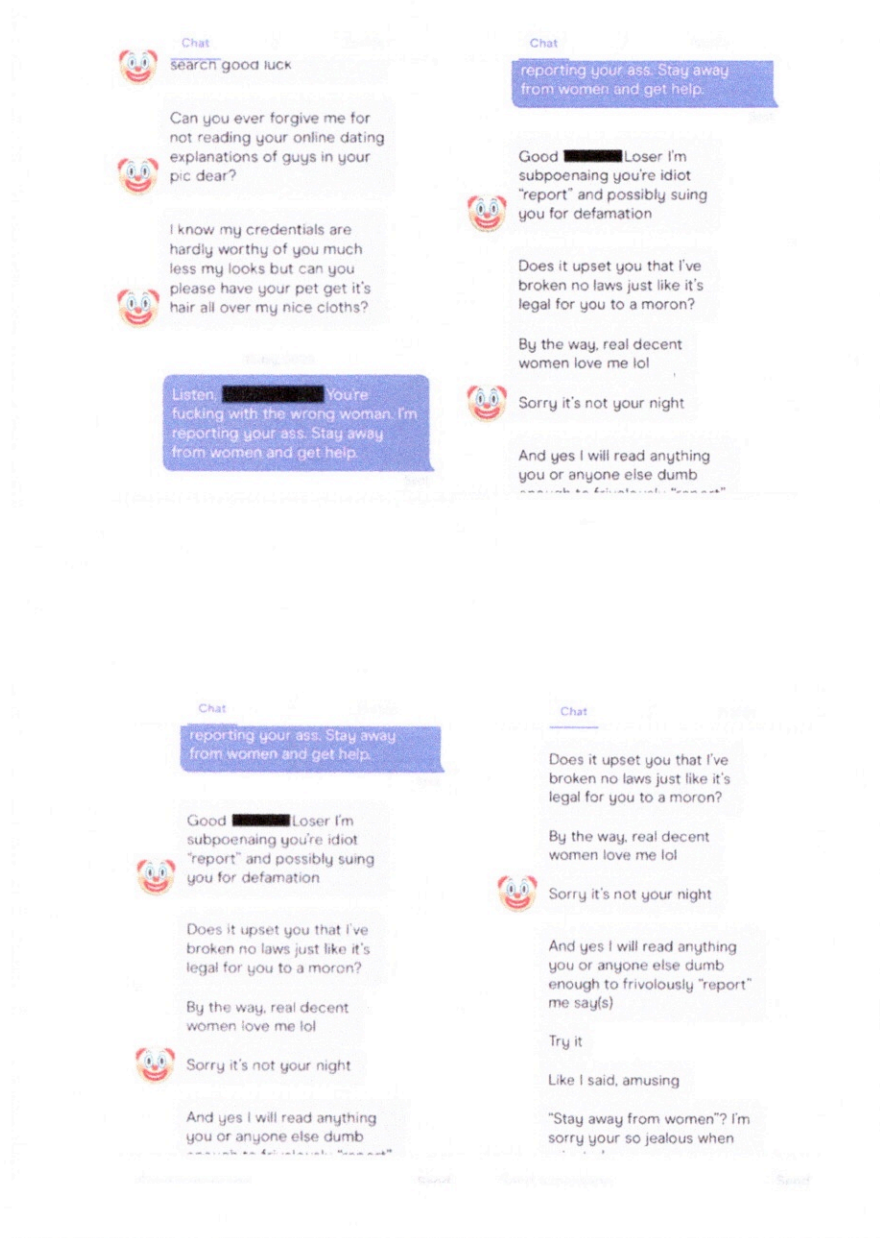
- If you would like to reach out regarding **REPRESENTATION**, please include "*REPRESENTATION*" in the subject line.
- If you have any other pertinent **INFO** you'd like to share, please include "*INFO*" in the subject line.
- If you're reaching out as a member of the **MEDIA**, please include "*MEDIA*" in the subject line.

Thank you for reading, donating and sharing, **we appreciate every bit of support!** Please stay safe out there!

[Share](#)[Donate](#)

Sincerely,
The Women of 23STCV14890

[Share](#)[Donate](#)



Updates (1)

March 13th, 2024

by Anonymous Defendant, Organizer

Update as of 3/13/24

Share

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Updates (1)

March 13th, 2024

by Anonymous Defendant, Organizer

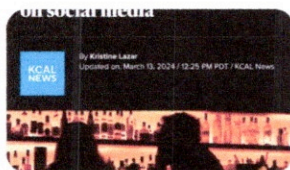
Update as of 3/13/24

Our interview aired on KCAL news and we are so happy with the traction that it continues to gain. Shout out to Kristine Lazar for giving us this initial platform! Trust that this is only the beginning.

Thank you to all past and present contributors to this campaign, as well as those who have shared our story. We're sincerely grateful for your support!

Watch for more updates in the coming days!

- The Women of 23STCV14890



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Share

Donate



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LOS ANGELES

Watch Live



'Are We Dating The Same Guy' lawsuit: LA man sues 50 women over bad reviews in viral Facebook group

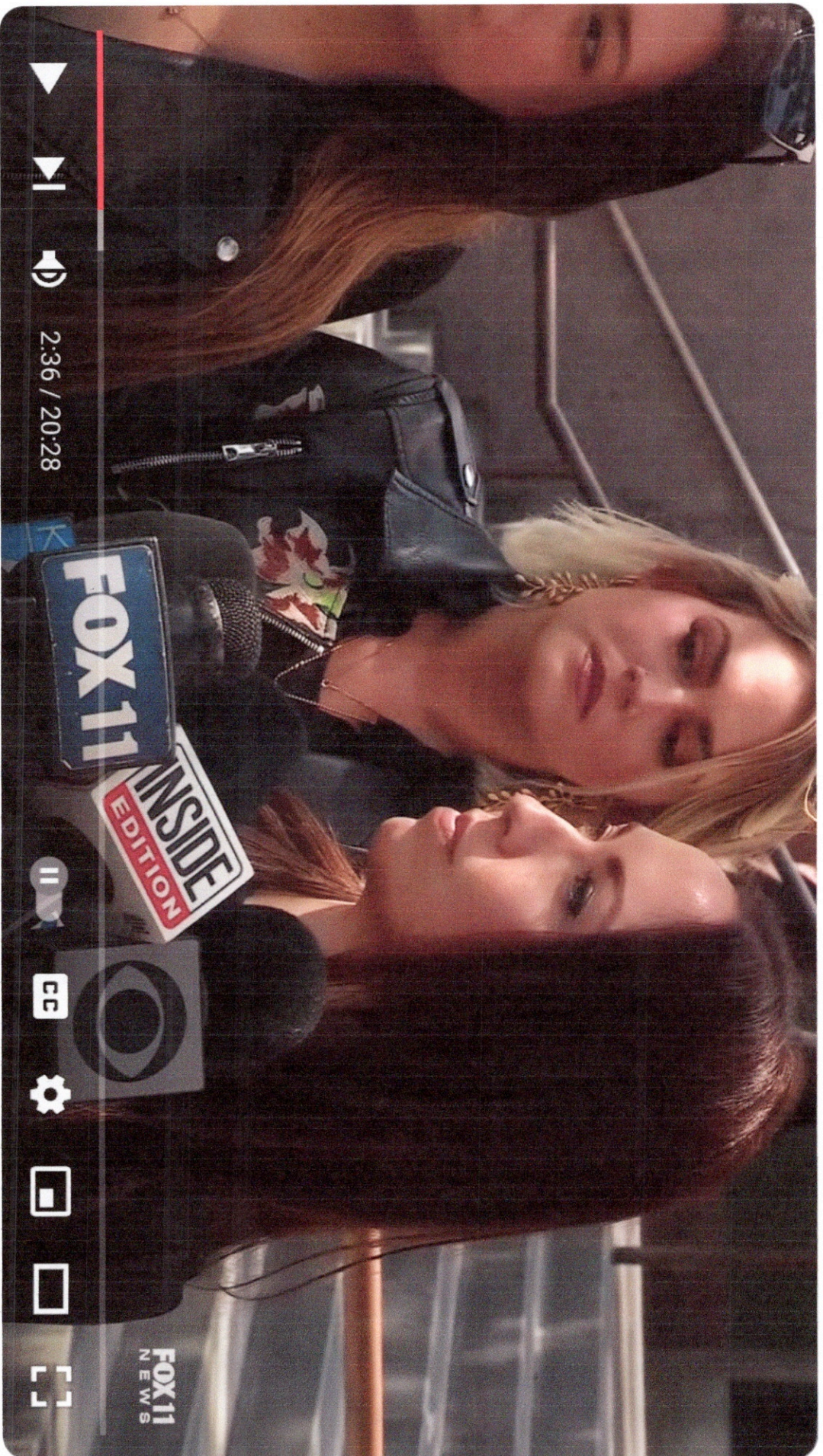
By Gina Silva

| Updated March 20, 2024 10:50am PDT

| Los Angeles | FOX 11 | 

'Are We Dating The Same Guy'
lawsuit press conference





'Are We Dating The Same Guy' lawsuit press conference



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California man suing women for \$2M over Facebook group ...

YouTube · FOX 26 Houston · Mar 20, 2024

YouTube ☒

FOX 26 California man suing women for \$2M over Facebook group comments

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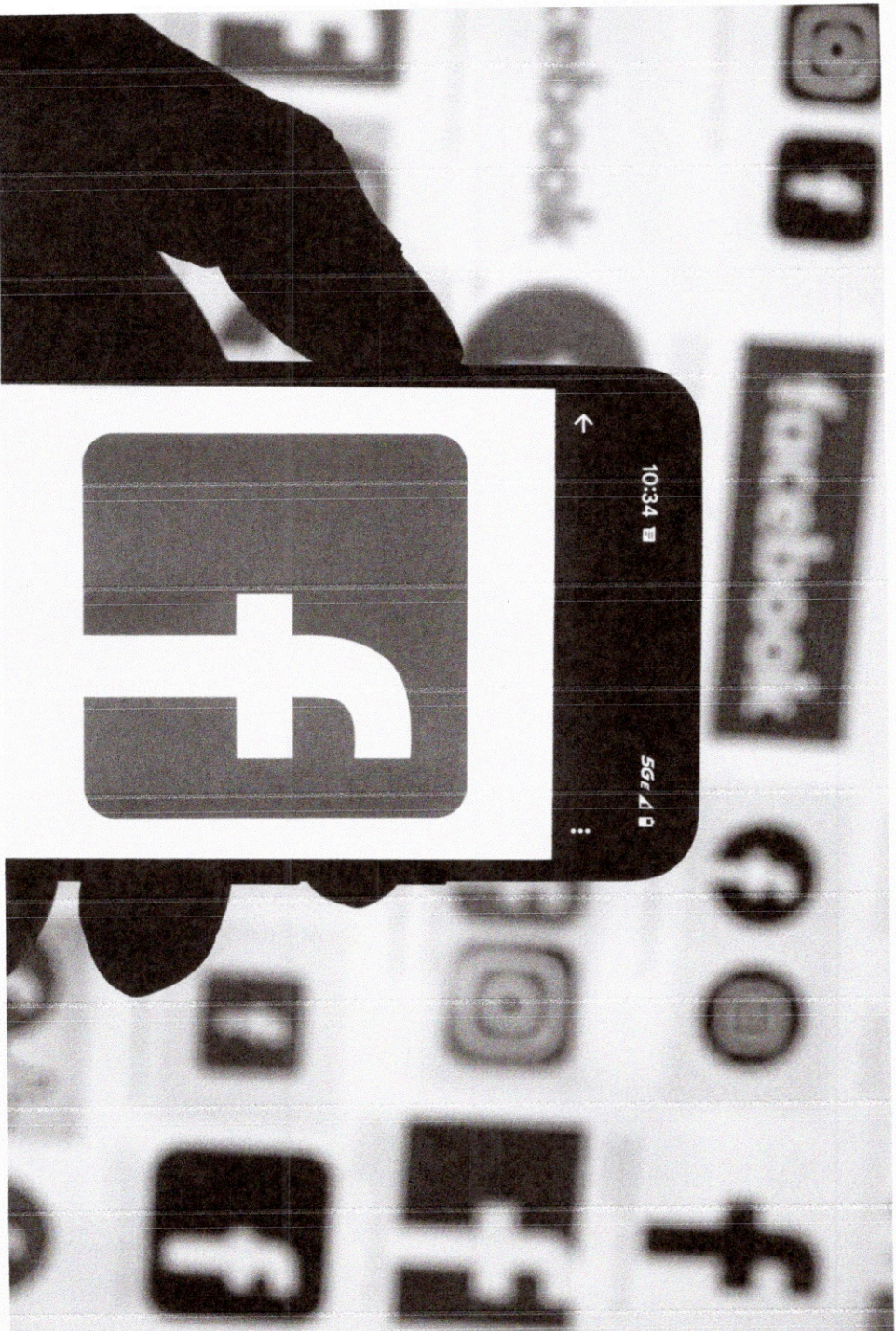
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NEWS > NATIONAL NEWS

L.A. man sues 50 'Are We Dating the Same Guy?' Facebook users for defamation



A Los Angeles man filed suit against more than 50 women he blames for defaming him in a Facebook group called "Are We Dating the Same Guy?" (AP Photo/Michael Dwyer, File)

L.A. man sues over 50 women for comments on Facebook group, 'Are We Dating The Same Guy?'

KTLA - Los Angeles

Wed, March 20, 2024 at 9:28 PM PDT



L.A. man sues over 50 women for comments on Facebook group, 'Are We Dating The Same Guy?'



HEADLINES hiff's Burbank office ktlac.com McDonald's franchisee 'can't raise prices en 70° 4:32P
1:05 / 2:41



A Los Angeles man is suing 50 women for negative posts they allegedly wrote

ALERT

Shohei Ohtani swindled out of millions by interpreter: LAT >

LOCAL NEWS

L.A. man sues over 50 women for negative comments on 'Are We Dating The Same Guy?' Facebook group

by: [Vivian Chow](#)

Posted: Mar 20, 2024 / 10:03 PM PDT

Updated: Mar 20, 2024 / 10:03 PM PDT



From left: Stewart Lucas Murrey seen in a personal photo; A group of defendants hold a press conference on March 20, 2024 addressing a lawsuit involving comments made on a ...
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Same Guy?' (AP Photo/Michael Dwyer, File)



By **BRIAN NIEMIETZ** | bniemiets@nydailynews.com | New York Daily News

March 21, 2024 at 12:54 p.m.



Listen to this article



A Los Angeles man filed a defamation suit against more than 50 women who posted about him in a Facebook group called "Are We Dating the Same Guy?"

Stewart Lucas Murrey accuses members of that group of engaging in online conversations that falsely tie him to domestic abuse, a murder case and extortion, according to KTLA in Los Angeles. The suit also says the women claimed Murrey has a sexually transmitted disease.

The defendants — many of whom never met Murrey and are seeking legal representation — were in a California court Tuesday. They included Olivia Berger, who reportedly said she did once dated the "arrogant and smug" plaintiff after meeting him on Tinder in 2021.

"It was the typical bad date behavior," Berger said of her experience with Murrey.

EXHIBIT 6

Went on one date with dr. Lucas Murrey years ago. In 20 minutes I could tell he was an egomaniac and a litigious psycho. He dropped so many red flags I had to run. I also googled him... just saw him on tinder and bumble.

Public records show:

Has several domestic violence charges filed against him plus involvement in MURDER case of his ex wife whom he had life insurance benefits from. (He mentioned this on the date)

Filed 11 court cases against women in 33 months trying to extort money from them. Has filed and been denied several restraining orders. Has acted aggressively in court.

He's on tinder. DONT DATE. Seriously the only time in my life that I've been scared of a man was the week following this date.

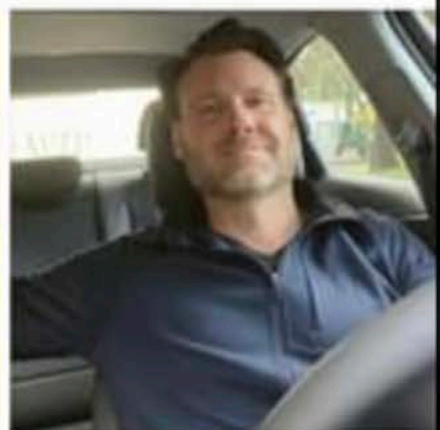
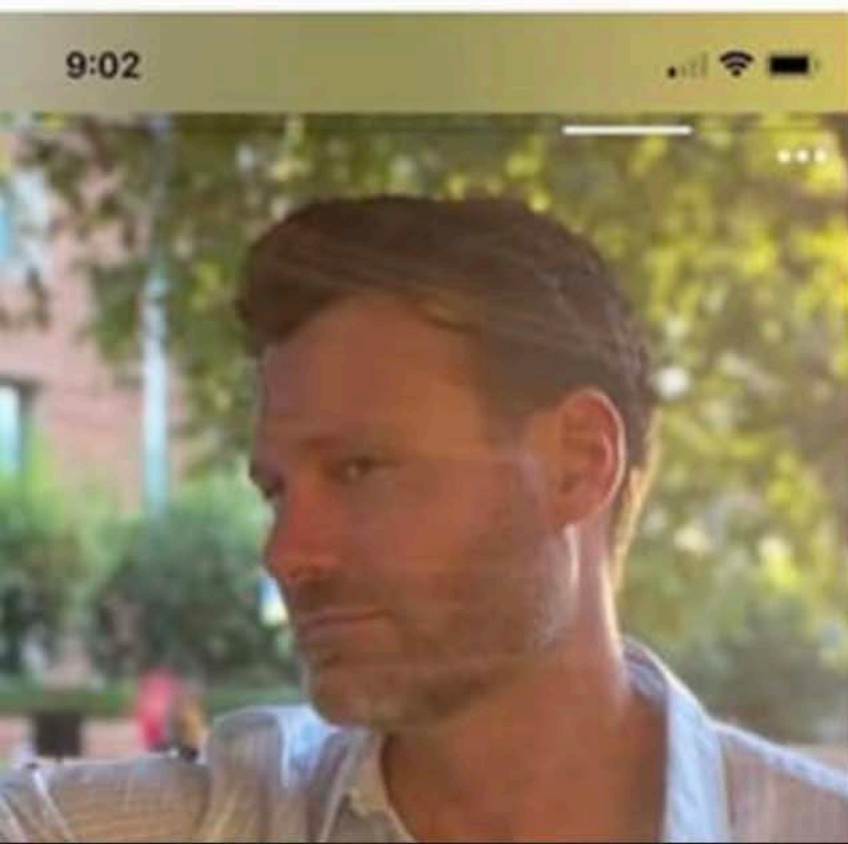


EXHIBIT 7



12:15



December 28, 2019
00:31

Edit



Please provide additional details

Lucas sent me some very strange, very aggressive messages out of nowhere. He called me names and said he liked "watching me burn". I feel threatened and afraid for any woman who agrees to meet with him in person. |

Submit

Q W E R T Y U I O P

A S D F G H J K L

↑ Z X C V B N M

Like Reply 9w



Kel Culb Gib Author

Vanessa this guy is unbelievable !



Like Reply 9w



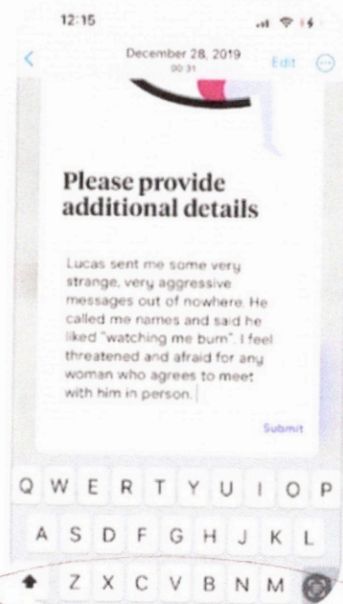
Vanessa Valdes

Kel So unbelievable. Thank you for sharing! I just joined this group and it's already been so helpful. I'm so glad we're protecting each other 🙌

Like Reply 9w



Vanessa Valdes



Like Reply 9w



Vanessa Valdes



EXHIBIT 8

Kel's Post

"Stay away from women"? I'm
sorry your so jealous when
rejected

And the screenshots/data of
you are enough to identify
you via said subpoena

Like Reply 9w



Lena Vanderford
Vanessa Valdes He is truly dangerous.



Like Reply 9w



Lena Vanderford
He is equally loved on social media....

EXHIBIT 9



Kari Woodring Webster

Wow. Talk about going down a rabbit hole. His Twitter makes him look insane and all the court cases. Wow

Like Reply 31w



↳ 3 Replies



Liv Burger

Be aware, he's still active on tinder. Just reported him

...

Like Reply 23w



↳ 6 Replies



Vanessa Valdes

HOW HAS THIS GUY NOT BEEN REMOVED FROM DATING APPS AND ARRESTED ALREADY?!?!?

I matched with him a couple years ago and received the most BIZARRE and threatening messages from him! It was so weird and scary that I even reported him to Hinge support, but never knew if anything was done about him. APPARENTLY NOT!! I'm so disgusted to see all these horrible testimonials about him, because it means he gets away with everything. He needs to be stopped!! Pics in comments below...

Like Reply 9w



↳ 16 Replies



Kel Culb Gib Author

UPDATE: REPORTED AND REMOVED FROM HINGE.

But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there. if

EXHIBIT 10

Elly Shariat

Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also he

All



9



1



Vanessa Valdes

Follow



Deirdra MacIntyre Cowen

Add Friend



Megan Cork

Add Friend



Jacqui Blue

Follow



Kel Culb Gib

Add Friend



Donna Dishbak

Add Friend



Liv Burger

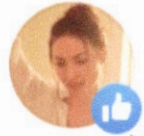
Add Friend

Elly Shariat omg that's terrible!



Kaitlin Lillywhite

I'm living for this thread



Vanessa Valdes



Kat Barre



Naomi Joy Garcia



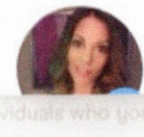
Caitlin Brown



Tara Wujcik



Donna Dishbak



Diane Leprince



Follow



Add Friend



Add Friend



Add Friend



Add Friend



Add Friend



Kel Culb Gib Author

UPDATE: REPORTED AND REMOVED FROM HINGE.

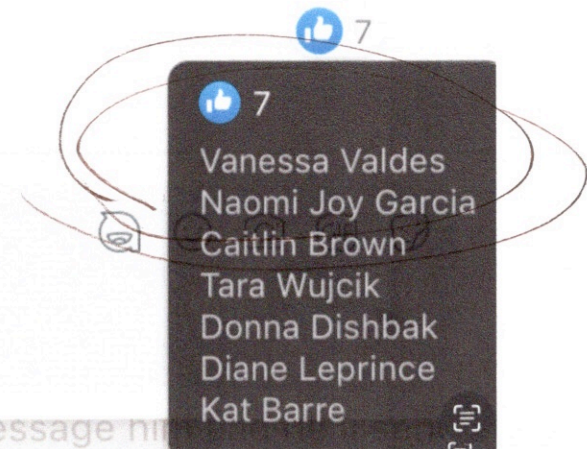
But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there, if you've matched with him on either place I encourage you to try to have him removed from those as well.

STAY SAFE LADIESSSS!!



Write a comment...



last week I've hardly heard from him. I'll message him

Like Reply 9w



Kel Culb Gib Author

Vanessa this guy is unbelievable !



Like Reply 9w



Vanessa Valdes

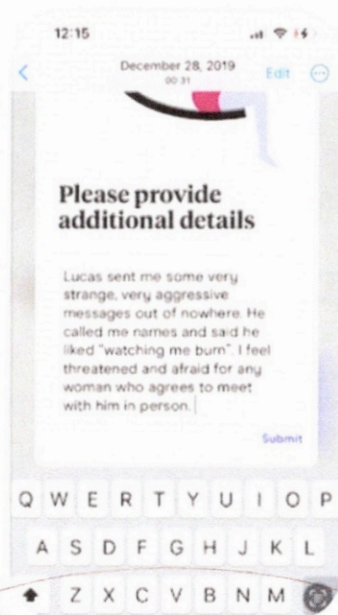
Kel So unbelievable. Thank you for sharing! I just joined this group and it's already been so helpful. I'm so glad we're protecting each other 🙏



Like Reply 9w



Vanessa Valdes



Like Reply 9w



Vanessa Valdes

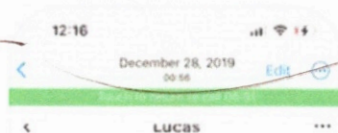


EXHIBIT 11

Kel's Post

And the screenshots/data of
you are enough to identify

you've said someone

Like Reply 9w



Lena Vanderford

Vanessa Valdes He is truly dangerous.

?

Like Reply 9w



2

↳ 4 Replies

The comment Vanessa Valdes is replying to has been deleted.



Vanessa Valdes

...

Like Reply 12w



Kel Culb Gib Author

Lena zero followers lol

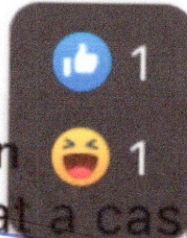


Like Reply 12w



Lauren-Ashleigh Christian

Lena Vanderford is that a cash tag



Like Reply 6w

The comment Vanessa Valdes is replying to has been

Vanessa Valdes

EXHIBIT 12

Vanessa's Post



Vanessa Valdes ▸ Are We Dating The Same Guy? | Los Angeles

July 13 · 🌐



Anonymous post for a member...

Any 🍵 or 🚩🚩



2

3 comments



Like



Comment



Send

Top comments ▼



Search Results

Are We Dating The Same Guy? | Los Angeles

vanessa valdes

Filters

Posts You've Seen



Most Recent



Posted by



Tagged Location



Date Posted



Vanessa Valdes

Lives in Los Angeles, California · 83 followers

[View profile](#)



Vanessa Valdes

July 13 · 🌐

Posting anonymously for a member...

Any 🧐 or 🚩?



4

6 comments



Like



Comment



Send



Vanessa Valdes

July 13 · 🌐

Anonymous post for a member...

Any 🧐 or 🚩



2

3 comments



Like



Comment



Send



Vanessa Valdes

June 21 · 🌐

Posting for another member...

"Any 🧐 or 🚩?? Details in comments."



6

10 comments



Like



Comment



Send

EXHIBIT 13

Kel's Post



👍 41

308 comments

👍 Like

💬 Comment

💬 Send

Most recent ▼



Charlotte Hannah 🖐️
This is dateline level bonkers!!!!

...

Like Reply 5h



Paige Cone 🖐️

Like Reply 1w Edited

The comment Kel Culb Gib is replying to has been deleted.



Kel Culb Gib Author

Paige We believe you, hon! I'm so sorry that happened 🙏

Like Reply 1w



Kel Culb Gib Author

I've been down a rabbit hole since reading these comments and I found the summaries he has online for one of the books he has published. It's all about the works of a German poet with severe mental illness who lived in a tower for 36



black hand



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About 8,840,000,000 results (0.39 seconds)

See results
about



Black Hand
Extortion

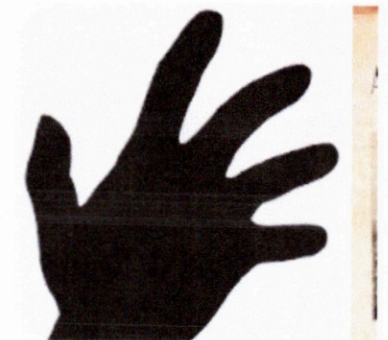
Black Hand, any of several extortion rackets run by immigrant Sicilian and Italian gangsters in the Italian communities of New York City, Chicago, New Orleans, Kansas City, and other U.S. cities from about 1890 to 1920. Feb 6, 2024



Britannica

<https://www.britannica.com/topic/Black-Hand-Ameri...>

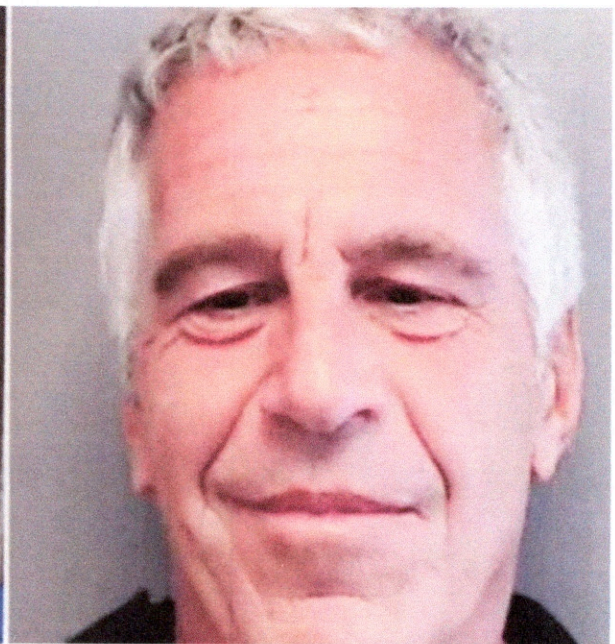
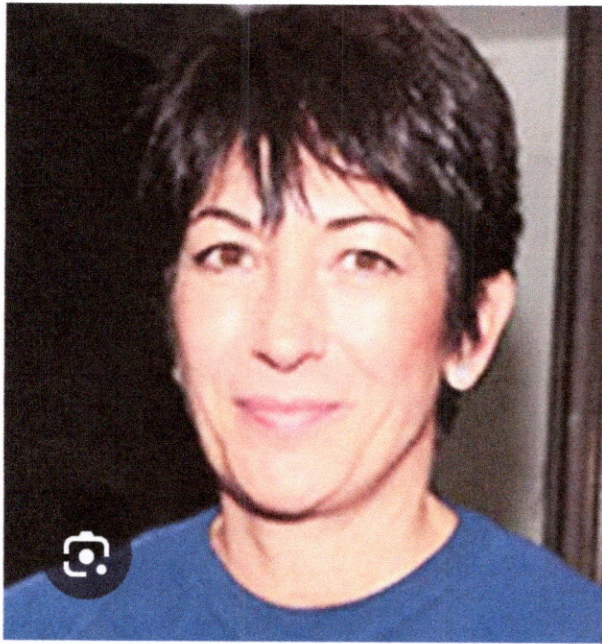
[Black Hand | Italian Mafia, Sicilian Immigrants & Crime ...](#)



About featured

People also ask

Black Hand



Jeffrey Epstein told Ghislaine Maxwell

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The murky life and death of Robert Maxwell
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Jeffrey Epstein's mysterious money:
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Are We Dating The Same Guy? | Los Angeles

Private group · 51.6K members



Are We Dating The Same Guy? | Los Angeles

Private group · 51.6K members



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Members · 51,610

New people and Pages who join this group will appear here. [Learn More](#)

paola san

Search results



Paola Sanchez - Admin

Admin



Joined on Thursday



EXHIBIT 14



FOX 11
LOS ANGELES

Watch Live



'Are We Dating The Same Guy' lawsuit: LA man sues 50 women over bad reviews in viral Facebook group

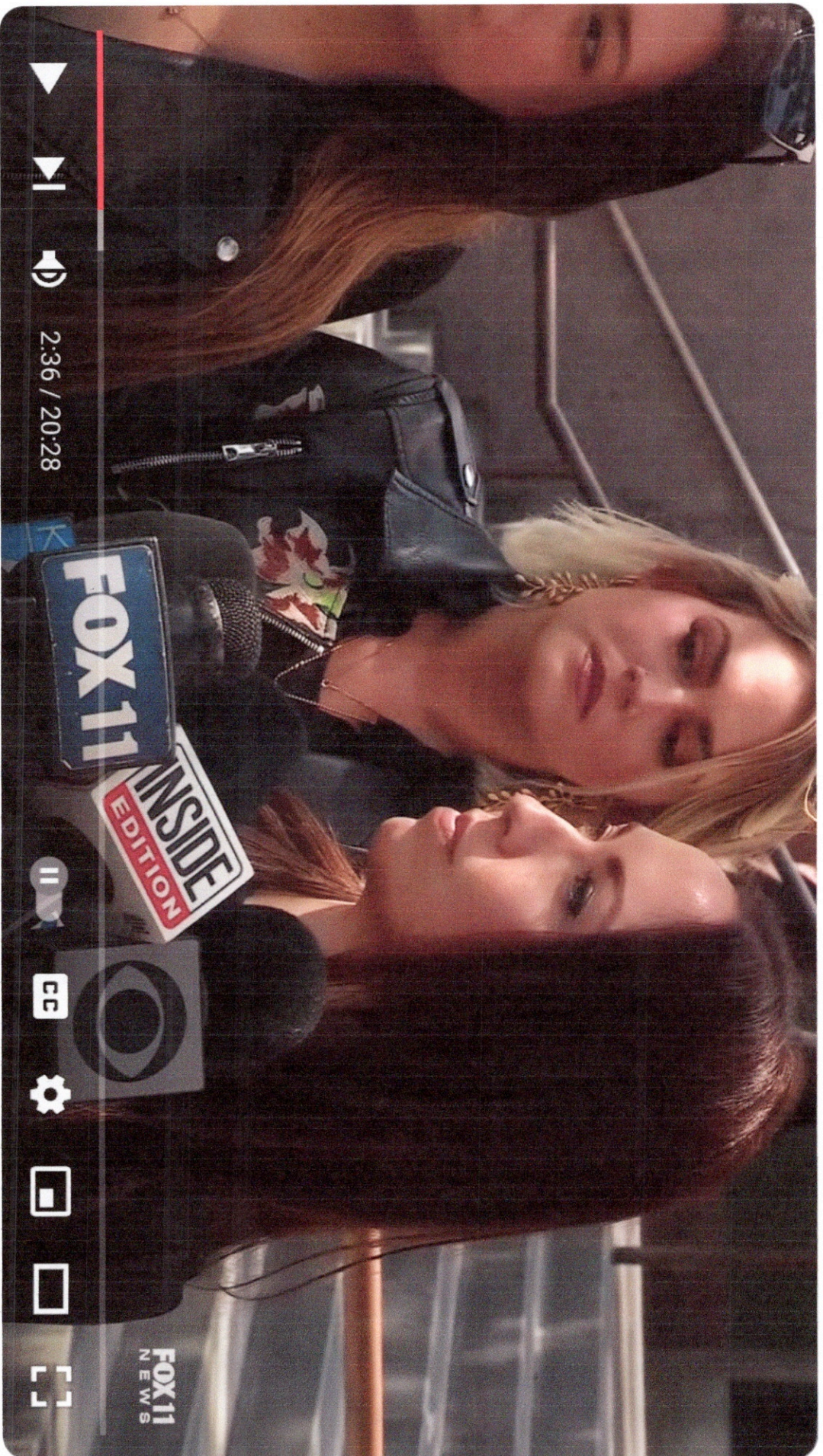
By Gina Silva

| Updated March 20, 2024 10:50am PDT

| Los Angeles | FOX 11 | 

'Are We Dating The Same Guy'
lawsuit press conference





'Are We Dating The Same Guy' lawsuit press conference



FOX 11 Los Angeles ✓
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California man suing women for \$2M over Facebook group ...

YouTube · FOX 26 Houston · Mar 20, 2024

YouTube ☒

FOX 26 California man suing women for \$2M over Facebook group comments

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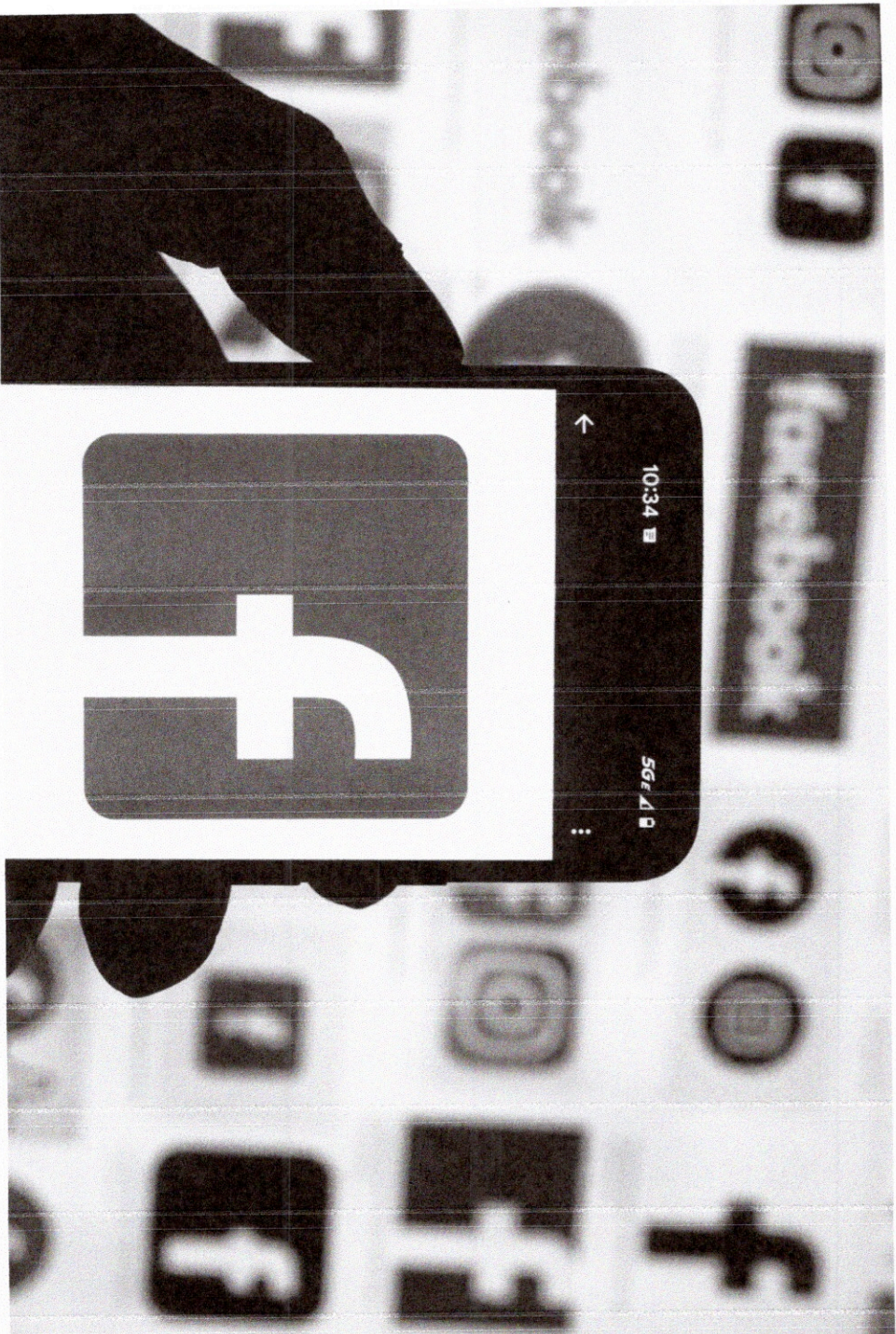
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▶ 5:47 PM 70°
1:22 / 1:55

  YouTube 

NEWS > NATIONAL NEWS

L.A. man sues 50 'Are We Dating the Same Guy?' Facebook users for defamation



A Los Angeles man filed suit against more than 50 women he blames for defaming him in a Facebook group called "Are We Dating the Same Guy?" (AP Photo/Michael Dwyer, File)

L.A. man sues over 50 women for comments on Facebook group, 'Are We Dating The Same Guy?'

KTLA - Los Angeles

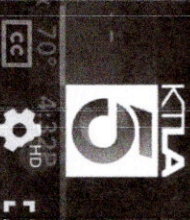
Wed, March 20, 2024 at 9:28 PM PDT



L.A. man sues over 50 women for comments on Facebook group, 'Are We Dating The Same Guy?'



HEADLINES hiff's Burbank office ktlac.com McDonald's franchisee 'can't raise prices en 70° 4:32P
1:05 / 2:41



A Los Angeles man is suing 50 women for negative posts they allegedly wrote

ALERT

Shohei Ohtani swindled out of millions by interpreter: LAT >

LOCAL NEWS

L.A. man sues over 50 women for negative comments on 'Are We Dating The Same Guy?' Facebook group

by: [Vivian Chow](#)

Posted: Mar 20, 2024 / 10:03 PM PDT

Updated: Mar 20, 2024 / 10:03 PM PDT



From left: Stewart Lucas Murrey seen in a personal photo; A group of defendants hold a press conference on March 20, 2024 addressing a lawsuit involving comments made on a ...
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Same Guy?' (AP Photo/Michael Dwyer, File)



By **BRIAN NIEMIETZ** | bniemiets@nydailynews.com | New York Daily News

March 21, 2024 at 12:54 p.m.



Listen to this article



A Los Angeles man filed a defamation suit against more than 50 women who posted about him in a Facebook group called "Are We Dating the Same Guy?"

Stewart Lucas Murrey accuses members of that group of engaging in online conversations that falsely tie him to domestic abuse, a murder case and extortion, according to KTLA in Los Angeles. The suit also says the women claimed Murrey has a sexually transmitted disease.

The defendants — many of whom never met Murrey and are seeking legal representation — were in a California court Tuesday. They included Olivia Berger, who reportedly said she did once dated the "arrogant and smug" plaintiff after meeting him on Tinder in 2021.

"It was the typical bad date behavior," Berger said of her experience with Murrey.

EXHIBIT 15

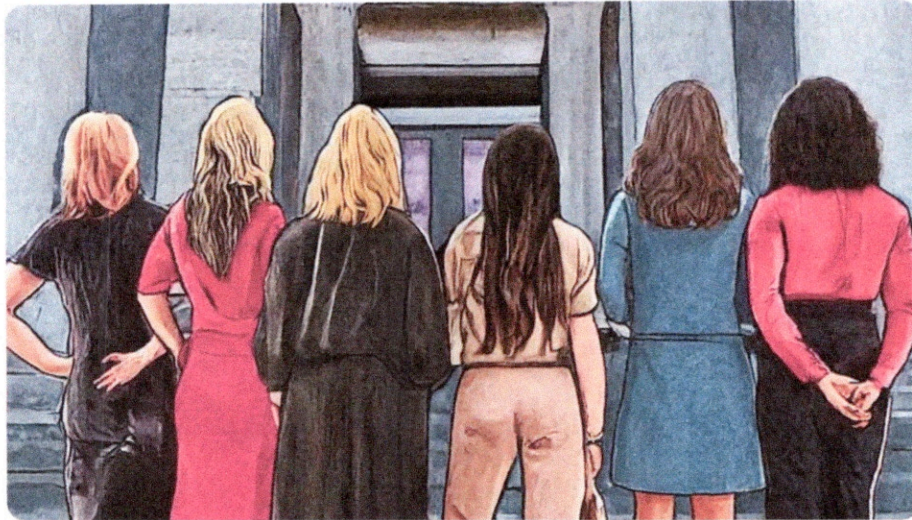
5:20



Facebook
www.gofundme.com



gofundme



Legal Fund for the Women of AWDTSG LOS ANGELES

\$1,345 raised of \$30,000 goal • 41 donations

Donate now



Copy link



Facebook



WhatsApp



Text



More



Anonymous Defendant is organizing this fundraiser.





Anonymous Defendant is organizing this fundraiser.



Donation protected

Hi there, thanks for taking the time to read this account of what has been our unfortunate reality over the past several months.

We are a collective of **female Defendants** who are being sued by one male Plaintiff. He has named 50+ defendants in total but is targeting a smaller core group. The Plaintiff brings forward claims of “*defamation*”, “*libel*”, “*civil conspiracy*”, “*gender violence*”, “*invasion of privacy*” etc.

This is not the first lawsuit in which this Plaintiff is making these claims.

Our lawsuit :

Case #23STCV14890,

Filed June 2023 in Los Angeles

The basis of his complaint is centered around a post that we commented on in the Facebook group ‘*Are We Datina The Same Guv. Los*

Share

Donate

Our lawsuit :**Case #23STCV14890,**

Filed June 2023 in Los Angeles

The basis of his complaint is centered around a post that we commented on in the Facebook group '*Are We Dating The Same Guy, Los Angeles*'. This post referenced him based on many **true** and negative experiences with him.

Due to this Facebook post, he is currently claiming damages amounting to the total of **\$2,600,000** for "*emotional distress*", "*pain and suffering*", "*medical expenses*", "*future medical expenses*" and "*punitive damages*".

To our knowledge, the AWDTSF FB groups were made with the intent of keeping women safe while dating by allowing them to share their dating experiences with others. In this group, it is customary to post warnings of unsavory interactions with men, as well as screenshots of those men's public photos and communications.

As you may know, there was a case filed and dismissed recently in Chicago.

Our case is completely separate, having been filed months prior by a different Plaintiff.

Share**Donate**

As you may know, there was a case filed and dismissed recently in Chicago.

Our case is completely separate, having been filed months prior by a different Plaintiff.

Likewise, this GFM is **not** tied to the Chicago case in any way, nor have we received any funds from that campaign.

Among our comments regarding the LA Plaintiff were various safety concerns. There were many firsthand accounts of **odd, scary and unsettling interactions** with the Plaintiff, including screenshots detailing those interactions.

He filed this suit in June of 2023, and failed to begin “serving” any of us with his complaint until November of 2023.

He has shown up / attempted to serve us at many of our workplaces and homes, often late at night, despite never having met most of us.

Since November, we have been forced to take valuable time out of our day-to-day lives to deal with this matter. We’re now seeking to hire suitable legal representation as our **first hearing date of March 20th, 2024** quickly approaches.

After consulting with various law firms on cost,

Share

Donate

After consulting with various law firms on cost, we've decided to set our initial goal to 30k.

We would like to make it very clear that this was **NOT** a sour post in reaction to our being "rejected" by the Plaintiff as he so claims. Rather, we were coming together to share **truthful** accounts of our personal experiences. These included **valid** concerns pertaining to the Plaintiff's unsettling behavior and background, all of which is public information.

To wrap this up, it is our *opinion* that this Plaintiff poses a **legitimate danger** to the women of Los Angeles. Our negative interactions with him have spanned years. We plan to finally put an end to his harassing ways once and for all, and we need your help to do it.

Any leftover funds will be *transparently* donated to other women forced to defend themselves in similar future cases. Rest assured, we will keep you updated every step of the way as we proudly and unwaveringly defend our **truth**.

We truly appreciate any and all help you're able to give. If you're unable to contribute financially, please consider sharing this fundraiser where you can.

[Share](#)[Donate](#)



We truly appreciate any and all help you're able to give. If you're unable to contribute financially, please consider sharing this fundraiser where you can.

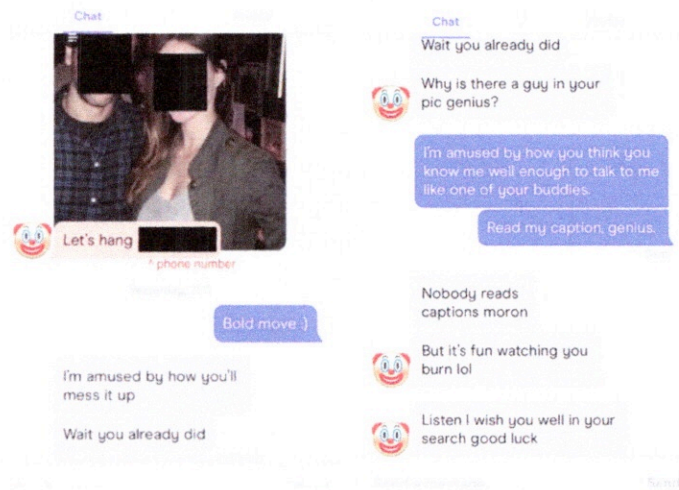
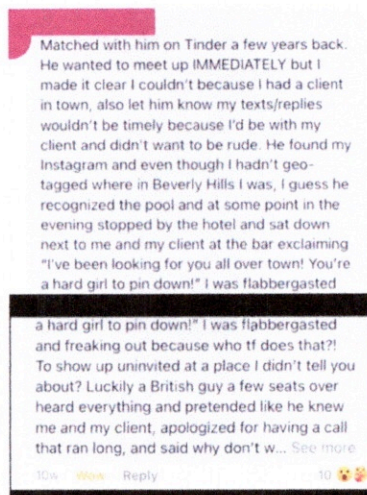
Any contact with us can be made via the "contact" button at the bottom of this page.

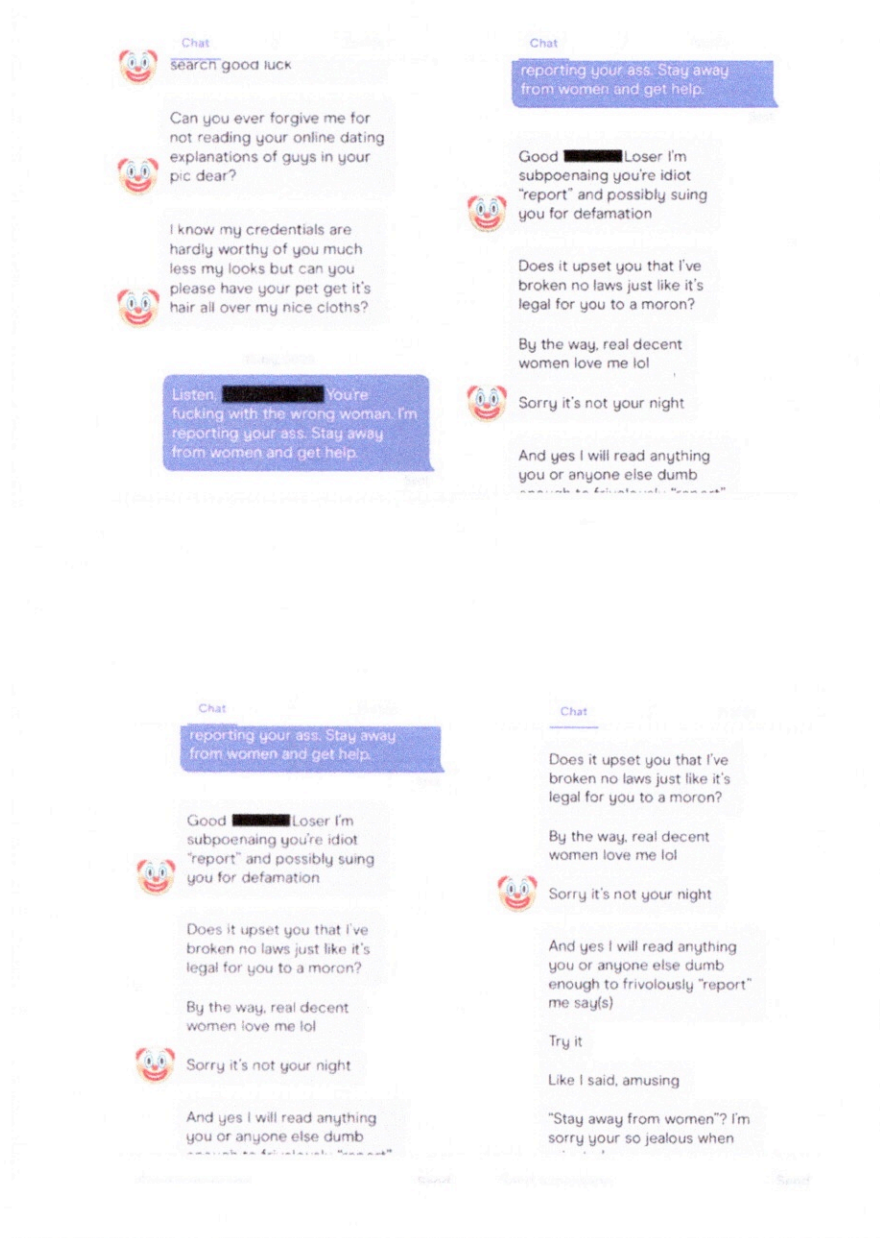
- If you would like to reach out regarding **REPRESENTATION**, please include "*REPRESENTATION*" in the subject line.
- If you have any other pertinent **INFO** you'd like to share, please include "*INFO*" in the subject line.
- If you're reaching out as a member of the **MEDIA**, please include "*MEDIA*" in the subject line.

Thank you for reading, donating and sharing, **we appreciate every bit of support!** Please stay safe out there!

[Share](#)[Donate](#)

Sincerely,
The Women of 23STCV14890

[Share](#)[Donate](#)



Updates (1)

March 13th, 2024

by Anonymous Defendant, Organizer

Update as of 3/13/24

Share

Donate

Updates (1)

March 13th, 2024

by Anonymous Defendant, Organizer

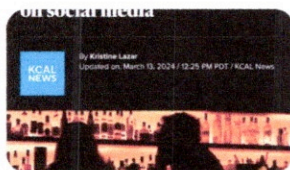
Update as of 3/13/24

Our interview aired on KCAL news and we are so happy with the traction that it continues to gain. Shout out to Kristine Lazar for giving us this initial platform! Trust that this is only the beginning.

Thank you to all past and present contributors to this campaign, as well as those who have shared our story. We're sincerely grateful for your support!

Watch for more updates in the coming days!

- The Women of 23STCV14890



Donate

Share

Share

Donate

EXHIBIT 16



@user-sj7gr8ks6g 1 day ago

hire the mafia ..wink wink

sleeps with da fishezzzzzzzz



1



Reply

@user-sj7gr8ks6g 9 days ago

soon he will get busted for crimes youll see



Reply

@JimJi 9 days ago

lets find this guy! 🗣️ 🗣️ 🗣️



5



Reply

EXHIBIT 17



Are We Dating The Same Guy? | Los Angeles



Kel Culb Gib · 4d ·



Lea Stuff

This is not okay stop gossiping about this dead man

3d

Like

Reply

5



Kel Culb Gib

🔒 Lea to be fair I had no idea he had passed when I made the post. Just to be clear, it's okay to gossip about men who are alive and not able to see the page or defend anything but not ones who unknowingly passed?

3d

Like

Reply

7



Kel Culb Gib

🔒 Lea this page is supposed to be a safe space to call out men who have been disrespectful. That's what he did. Him dying doesn't change his behavior in life.

3d

Like

Reply

20



Miriam Jackson

[Kel Culb Gib](#) I'm with you

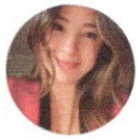
1d

Like

Reply

1





Liv Burger

He had a partner 10000%.

Something similar happened to me years ago. Was on a layover in different city. Went to eat at a bar across the street from the hotel. Met a guy there and turns out he was staying at the same hotel. After talking for a while at the bar I invited him back to my room and we talked for a few more hours and things were starting to get hot and heavy.

He said he was gunna go grab a condom from his room and then just never came back. I was confused so I took the details he had told me (hometown, company he worked for, name) and quickly found his fb. His cover photo was of his wife and their newborn child. 🙄

I've had experiences since that seemed totally explainable on their end only to find out that they're cheating. It's becoming super common unfortunately. Sorry that happened, best to just block and move on!

1y Like Reply

22 🤔 👍

< Are We Slandered By the Same Girl? Or...



Are We Slandered By the Same Girl?
Orange County -Huntington Beach - Irvine

· [Follow](#)

6d · 🌐

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.



Like



Comment



Send



Share



Are We Datin...



Anonymous member



1h · 🐾

Has anyone matched with this guy?
He says his name is Amir from LA



Message Are We Slandered By the Same G...

< liv burger

All

Posts

People

Reels

Groups

Pages



Are We Slandered By the Same Girl?
Orange County -Huntington Beach -
Irvine · [Follow](#)

...

Feb 20 · 🌐

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.

< Are We Datin... 🔍 ↗️ ☰ comments ▾



Anonymous member

1h · 🌐

Has anyone matched with this guy?
He says his name is Amir from LA



5 comments



Like



Comment



Send



Liv Burger

Matched aaages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met.

Like Reply

1 +



Lisa Todd

Matched when I lived in LA so maybe like 2014. (Same picture btw) I never met him but he got super aggressive and pushy about meeting. I ended up blocking him

55m Like Reply



Anonymous member Lisa Todd than



Sara Kash

He's liked my profile but I never matched with him. Also, he's been posted in the AWDTS LA group several times.

27m Like Reply



Liv Burger

Matched aaages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met.

15m Like Reply



Anonymous member Liv Burger than



Home



Video



Marketplace



Dating



Notifications



Menu

EXHIBIT 18



Vanessa Valdes

184 points

Group posts

Vanessa's contributions

Intro

Member of Are We Dating The Same Guy? | Los Angeles
since January 8, 2023

Things in common

Also member of Are We Dating The Same Guy? | Los Angeles, Don't Date Him/Dating Advice/Vouched Dating/Los Angeles/SFV) and 2 other groups

WOMEN



1

Message

View main profile



Group posts



Vanessa Valdes ▸ Are We Dating The Same Guy? | Los Angeles
July 13 · 🌐



Anonymous post for a member...

Any 🌐 or 🚩

2

3 comments

Like

Comment...

Send



Vanessa Valdes

185 points

Message

View main profile

Group posts

Vanessa's contributions

185 points

in Are We Dating The Same Guy? | Los Angeles



Vanessa's close to becoming a top contributor
Vanessa can continue to participate in Are We Dating The Same Guy? | Los Angeles to join the top 10% of contributors and earn the top contributor badge.

How Vanessa earned points

Interactions
185 points

Her role
0 points



Vanessa Valdes

 185 points

 Message

 View main profile

Group posts

Vanessa's contributions

...

185 points ^①

in Are We Dating The Same Guy? | Los Angeles



Vanessa's close to becoming a top contributor
Vanessa can continue to participate in Are We Dating The Same Guy? | Los Angeles to join the top 10% of contributors and earn the top contributor badge.

How Vanessa earned points ^①



Interactions

185 points



Her role

0 points



Vanessa Valdes

319 points

Message

View profile

Group posts

Vanessa's contributions

Intro

Member of Are We Dating The Same Guy? | Los Angeles since January 8, 2023

Things in common

Also member of Are We Dating The Same Guy? | Los Angeles, Vouched Dating - Verified Guys & Group Matchmaking | Los Angeles and 2 other groups

Recent Activity

Vanessa Valdes commented on Paola Sanchez's post: "Bump"

Group posts



Vanessa Valdes Are We Dating The Same Guy? | Los Angeles July 13, 2023

Anonymous post for a member...

Any or

2

3 comments

Like

Comment

Send

View more comments




Vanessa Valdes Author Initials are G.B.





Vanessa Valdes  319 points

 Message

 View profile

Group posts Vanessa's contributions

...

319 points

in Are We Dating The Same Guy? | Los Angeles



Vanessa's close to becoming a top contributor

Vanessa can continue to participate in Are We Dating The Same Guy? | Los Angeles to join the top 10% of contributors and earn the top contributor badge.

How Vanessa earned points

 Interactions
319 points

 Her role
0 points

Make your mark too! Track your progress toward becoming a top contributor.

See your points

Frequently asked questions

What are Contributions? 

How to earn a Top Contributor badge 

What's the value of holding a badge? 

Do these carry over to my other groups? 

Learn more


Are We Dating The Same Guy? | Los Angeles



- Discussion
- Featured
- Rooms
- Members**
- Media
- Files

Members · 44,588

New people and Pages who join this group will appear here. [Learn More](#)

 vanessa valdes|

Search results



Vanessa Valdes

Joined about 7 months ago
Los Angeles, California



Vanessa Valdes

- Message
- View main profile

Group posts

...

Intro

Member of Are We Dating The Same Guy? | Los Angeles since January 8, 2023

Things in common

Also member of Are We Dating The Same Guy? | Los Angeles and 2 other groups

Group posts

No new posts

Vanessa Valdes hasn't posted anything yet in Are We Dating The Same Guy? | Los Angeles.

Go back

Recent Activity

Vanessa Valdes liked Kayla Natali's comment: "From my experience maybe not all the time but most of the time guys who take photos like this, shirtless selfies, selfies, or just pretty boy pics are usually not great husbands, but to each their own experiences and opinions"

Vanessa Valdes reacted to Blessing Chen's comment: "Victoria Hr girl!!!! all I saw were those 1000+ messages"

Vanessa Valdes liked Jenn Phippen's comment: "I would respond with, "I may be interested in spending time with you, what did you have in mind?" This usually makes them rethink what they're going to say next lol"



Are We Dating The Same Guy? | Los Angeles

Private group · 51.7K members



Are We Dating The Same Guy? | Los Angeles

Private group · 51.7K members



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Members · 51,694

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vanessa valdes

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No results for "vanessa valdes"



Are We Dating The Same Guy? | Orange County OC / Irvine / Huntington Beach

Private group · 26.5K members



Are We Dating The Same Guy? | Orange County OC / Irvine / Huntington Beach

Private group · 26.5K members



+ Invite

Share

Joined

Discussion

Featured

Members

Events

Media

Files



Members · 26,471

New people and Pages who join this group will appear here. [Learn More](#)

vanessa valdes

Search results

No results for "vanessa valdes"



Are We Dating The Same Guy? | Los Angeles

Private group · 29.8K members

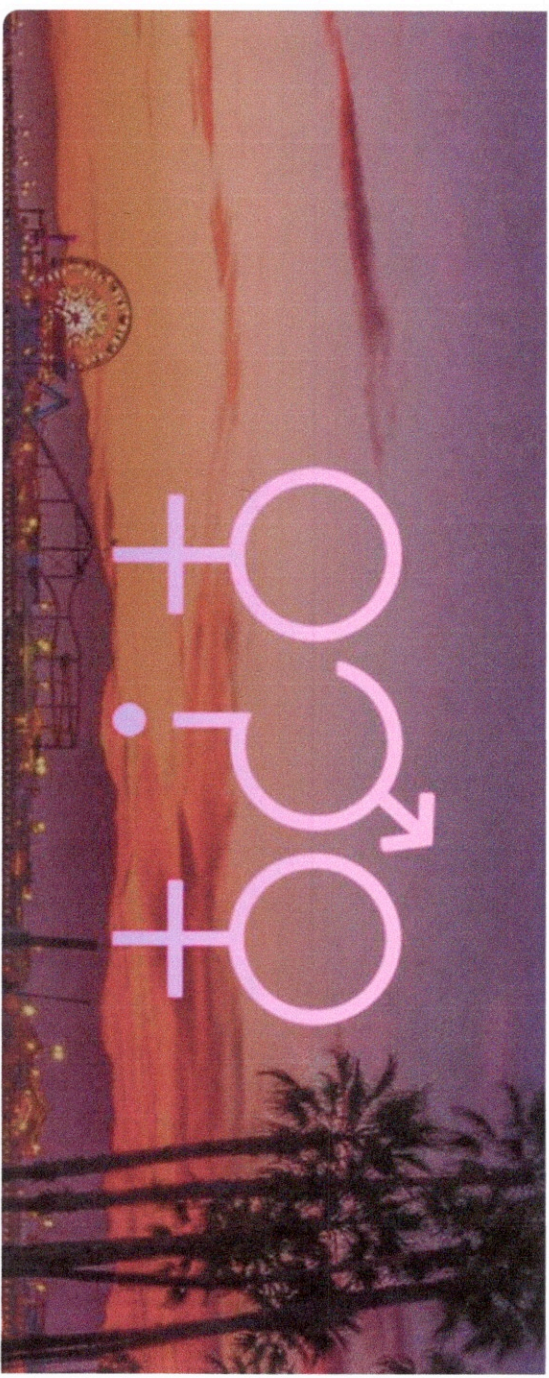
Joined ▾



Community home

Rooms

Events



Are We Dating The Same Guy? | Los Angeles



+ Invite

Discussion

Reels

Members

Media

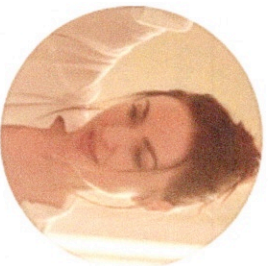
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Joined ▾



ity home



Vanessa Valdes




Lives in Los Angeles,
California



Followed by 83 people

 Follow

 Message



ie Same
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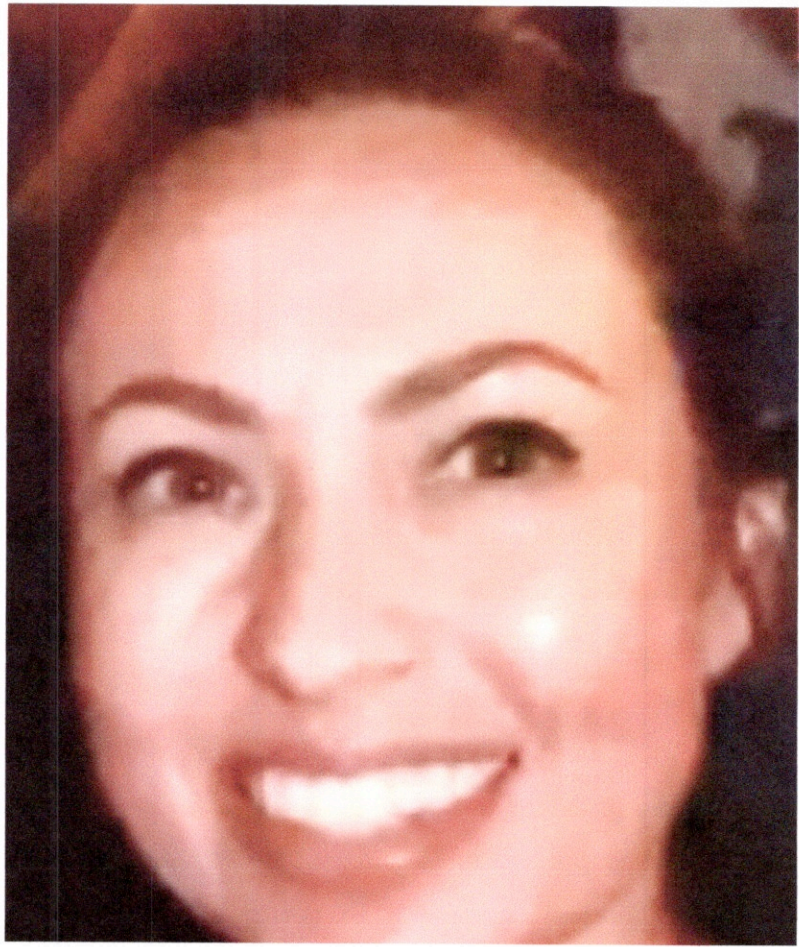
Discussion

Reels

Members

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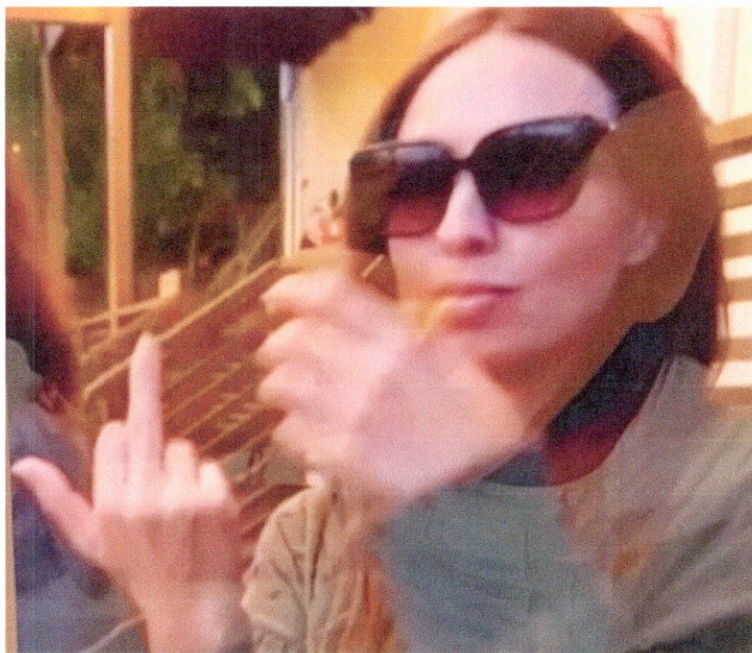


EXHIBIT 19



February 26, 2023 at 2:02:53 PM
19 of 32



Admins have received your answers
and you'll be notified if your request
to join is approved.



February 28, 2023 at 10:41:35 AM
20 of 20



Admins have received your answers
and you'll be notified if your request
to join is approved.





b

Notice of Facebook and its Admins/Moderators Violation of My Right to Fre...

To: legal@facebook.com, subpoena@facebook.com & 2 more

6:03 PM

[Details](#)

You are hereby on notice that Facebook and its admins and moderators have violated my fundamental right to freedom of speech to defend my good name and reputation against extreme defamation, false light, invasion of privacy, iied and a host of other civil and criminal torts. These have been occurring and continue to occur for years now in countless Facebook private groups from which I have been denied access such that I cannot voice my opposing views to the above-noted criminal and tortious statements about my person. Thus, once again, I am requesting immediate access to all these groups including, but not limited too "Are we dating the same guy - Los Angeles" and all the other cities and counties and regions and any and all other such groups. I have a right to voice my own opposing views along with add to my comments and postings links and evidence in support thereof just as those aggressively harming my life and work have voiced their statements and provided said links. The only difference of course is that I will act within the law, which makes the violations of Facebook and its admin/moderators of my rights even more egregious. This letter will also be used as evidence in my forthcoming lawsuit against said admins and moderators as well as FB itself.

Dr. Lucas Murrey
Ph.D Yale University

Author of Hölderlin's Dionysiac Poetry and Nietzsche: The Meaning of Earth
lucasmurrey.com

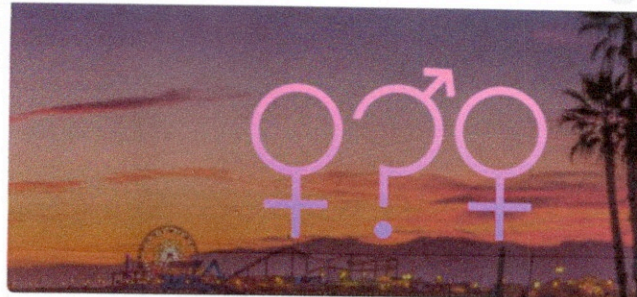
March 22, 2024 at 1:25:38 AM

1 of 1



Are We Dating The Same Guy? | Los Angeles

Private group · 52.5K members



Are We Dating The Same Guy? | Los Angeles

Private group · 52.5K members

[Join group](#)

[About](#) [Discussion](#)

About this group

This group is a place for women to protect, support, and empower other women. A place where woman can speak freely, openly, and honestly witho... [See more](#)

Private

Only members can see who's in the group and what they post.

Visible

Anyone can find this group.

History

Group created on March 5, 2022. Name last changed on May 28, 2022. [See more](#)

Admins have received your answers and you'll be notified if your request to join is approved.

EXHIBIT 20

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403

TELEPHONE NO.: (424) 278-3017

FAX NO. (Optional):

E-MAIL ADDRESS (Optional): 2@lucasmurrey.io

ATTORNEY FOR (Name): In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

SHORT TITLE OF CASE: Dr. Murrey v. Gibbons et al.

FORM INTERROGATORIES—GENERAL

Asking Party: Plaintiff Dr. Murrey

Answering Party: Defendant Vanessa Valdes
Set No.: 1

CASE NUMBER:

23STCV14890

Sec. 1. Instructions to All Parties

(a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.

(b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.

(c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

Sec. 2. Instructions to the Asking Party

(a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, Form *Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.

(b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.

(c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.

(d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.

(e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

(a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.

(b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

(c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.

(d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.

(e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.

(f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.

(g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.

(h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(DATE)

(SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

(a) (Check one of the following):

- ☐ (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

- ☒ (2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)"): All causes plaintiff alleged in operative complaint as committed by defendant Vanessa Valdez.

(b) YOU OR ANYONE ACTING ON YOUR BEHALF

includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.

(c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

(d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

(f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002]
- Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

- ☒ 1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information—individual

- ☒ 2.1 State:
- (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- ☒ 2.2 State the date and place of your birth.
- ☒ 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
- (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☒ 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
- (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☒ 2.5 State:
- (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- ☒ 2.6 State:
- (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- ☒ 2.7 State:
- (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- ☒ 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
- (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- ☒ 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- ☒ 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

- ☒ 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:
- (a) the name, **ADDRESS**, and telephone number of that **PERSON**; and
 - (b) a description of your duties.

- ☒ 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
 - (b) the nature of the disability or condition; and
 - (c) the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.

- ☐ 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
 - (b) the nature or description of each substance;
 - (c) the quantity of each substance used or taken;
 - (d) the date and time of day when each substance was used or taken;
 - (e) the **ADDRESS** where each substance was used or taken;
 - (f) the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
 - (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

- ☒ 3.1 Are you a corporation? If so, state:
- (a) the name stated in the current articles of incorporation;
 - (b) all other names used by the corporation during the past 10 years and the dates each was used;
 - (c) the date and place of incorporation;
 - (d) the **ADDRESS** of the principal place of business; and
 - (e) whether you are qualified to do business in California.
- ☒ 3.2 Are you a partnership? If so, state:
- (a) the current partnership name;
 - (b) all other names used by the partnership during the past 10 years and the dates each was used;
 - (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;
 - (d) the name and **ADDRESS** of each general partner; and
 - (e) the **ADDRESS** of the principal place of business.
- ☒ 3.3 Are you a limited liability company? If so, state:
- (a) the name stated in the current articles of organization;
 - (b) all other names used by the company during the past 10 years and the date each was used;
 - (c) the date and place of filing of the articles of organization;
 - (d) the **ADDRESS** of the principal place of business; and
 - (e) whether you are qualified to do business in California.

- ☒ 3.4 Are you a joint venture? If so, state:
- (a) the current joint venture name;
 - (b) all other names used by the joint venture during the past 10 years and the dates each was used;
 - (c) the name and **ADDRESS** of each joint venturer; and
 - (d) the **ADDRESS** of the principal place of business.

- ☒ 3.5 Are you an unincorporated association? If so, state:
- (a) the current unincorporated association name;
 - (b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and
 - (c) the **ADDRESS** of the principal place of business.

- ☒ 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:
- (a) the name;
 - (b) the dates each was used;
 - (c) the state and county of each fictitious name filing; and
 - (d) the **ADDRESS** of the principal place of business.

- ☒ 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:
- (a) identify the license or registration;
 - (b) state the name of the public entity; and
 - (c) state the dates of issuance and expiration.

4.0 Insurance

- ☒ 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:
- (a) the kind of coverage;
 - (b) the name and **ADDRESS** of the insurance company;
 - (c) the name, **ADDRESS**, and telephone number of each named insured;
 - (d) the policy number;
 - (e) the limits of coverage for each type of coverage contained in the policy;
 - (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
 - (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.
- ☒ 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

- ☐ 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).
- ☐ 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

- ☐ 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:
- (a) a description;
 - (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
 - (c) the frequency and duration.

- ☐ 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

- ☐ 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- (a) the name;
- (b) the **PERSON** who prescribed or furnished it;
- (c) the date it was prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

- ☐ 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each provider.

- ☐ 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- (b) the complaints for which the treatment was advised; and
- (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

- ☐ 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- (a) describe the property;
- (b) describe the nature and location of the damage to the property;

- (c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and
- (d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

- ☐ 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- (c) the amount of damage stated.

- ☐ 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- (a) the date repaired;
- (b) a description of the repair;
- (c) the repair cost;
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

- ☐ 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

- ☐ 8.2 State:

- (a) the nature of your work;
- (b) your job title at the time of the **INCIDENT**; and
- (c) the date your employment began.

- ☐ 8.3 State the last date before the **INCIDENT** that you worked for compensation.

- ☐ 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

- ☐ 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

- ☐ 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

- ☐ 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

- ☐ 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- (a) the facts upon which you base this contention;
- (b) an estimate of the amount;
- (c) an estimate of how long you will be unable to work; and
- (d) how the claim for future income is calculated.

9.0 Other Damages

- ☐ 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- (a) the nature;
 - (b) the date it occurred;
 - (c) the amount; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.
- ☐ 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- ☐ 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:
- (a) a description of the complaint or injury;
 - (b) the dates it began and ended; and
 - (c) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.
- ☒ 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. (*You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.*)
- ☒ 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:
- (a) the date and the place it occurred;
 - (b) the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
 - (c) the nature of any injuries you sustained;
 - (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
 - (e) the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- ☒ 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:
- (a) the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
 - (b) the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- (c) the court, names of the parties, and case number of any action filed;
- (d) the name, **ADDRESS**, and telephone number of any attorney representing you;
- (e) whether the claim or action has been resolved or is pending; and
- (f) a description of the injury.

- ☐ 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:
- (a) the date, time, and place of the **INCIDENT** giving rise to the claim;
 - (b) the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
 - (c) the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
 - (d) the period of time during which you received workers' compensation benefits;
 - (e) a description of the injury;
 - (f) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
 - (g) the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- ☒ 12.1 State the name, **ADDRESS**, and telephone number of each individual:
- (a) who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
 - (b) who made any statement at the scene of the **INCIDENT**;
 - (c) who heard any statements made about the **INCIDENT** by any individual at the scene; and
 - (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).
- ☒ 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
 - (b) the date of the interview; and
 - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- ☒ 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
 - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
 - (c) the date the statement was obtained; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

☒ 12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

☒ 12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

☒ 12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

☒ 12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

☒ 13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

☒ 13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

☒ 14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

☒ 14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

☒ 15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

☒ 16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:

- (a) identify it;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:

- (a) identify each service;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:

- (a) identify each cost;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:

- (a) identify each part of the loss;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:

- (a) identify each item of property damage;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:

- (a) identify each cost item;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☒ 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:

- (a) the source of each **DOCUMENT**;
- (b) the date each claim arose;
- (c) the nature of each claim; and
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☒ 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310)? If so, for each plaintiff state:

- (a) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
- (b) a description of each **DOCUMENT**; and
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

17.0 Responses to Request for Admissions

☒ 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

18.0 [Reserved]

19.0 [Reserved]

20.0 How the Incident Occurred—Motor Vehicle

☐ 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).

☐ 20.2 For each vehicle involved in the **INCIDENT**, state:

- (a) the year, make, model, and license number;
- (b) the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.

☐ 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.

☐ 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.

☐ 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.

☐ 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.

☐ 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:

- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.

☐ 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:

- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.

☐ 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and

- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.

25.0 [Reserved]

30.0 [Reserved]

40.0 [Reserved]

50.0 Contract

- ☒ 50.1 For each agreement alleged in the pleadings:
- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
 - (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
 - (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
 - (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
 - (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
 - (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.

☒ 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.

☒ 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.

☒ 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.

☒ 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.

☒ 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

60.0 [Reserved]

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 2 January 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Form Interrogatories:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

By Mail: _XXX_.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:

By Email: ____.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 2 January 2024

By: 

Eliot Wenik

1 Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
2 Santa Monica, CA 90403
3 Tel.: (424) 278-3017
4 Email: 2@lucasmurrey.io
Websites: sickoscoop.com/lucas, lucasmurrey.com
5 Plaintiff & Plaintiff In Pro Per

6
7 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**
8 **STANLEY MOSK COURTHOUSE**

9 DR. STEWART LUCAS MURREY, an
10 individual;

11 Plaintiff,

12 Vs.

13 Kelly Gibbons a.k.a. Kel Culb Gib, et al.;

14 Defendants.
15

) Case No. 23STCV14890

) **PLAINTIFF DR. MURREY'S SPECIAL**
) **INTERROGATORIES TO DEFENDANT**
) **VANESSA VALDES**

) Dept.: 61

) Complaint Filed: 27 June 2023
) Hon. Gregory Keosian

16
17 Propounding Party: Plaintiff Dr. Murrey

18 Responding Party: Defendant Vanessa Valdes

19 SET NO.: One

20 To DEFENDANT VANESSA VALDES:

21 Plaintiff Dr. Murrey requests that Defendant Vanessa Valdes (hereafter also "you" or
22 "defendant") respond in writing under oath, pursuant to the *Code of Civil Procedure* § 2030, to the
23 following interrogatories within thirty (30) days after service thereof.
24

25 **SPECIAL INTERROGATORIES**

26 The following definitions and instructions apply throughout this request for identification and
27 production, unless the context clearly indicates otherwise:
28

1 A. This request requires that you produce all writings responsive to any of the following
2 numbered requests which are in your possession or control or subject to your control, wherever they
3 may be located. The writings which you must identify and produce include not only writings which
4 you presently possess, but also writings which are in the possession or control of your attorneys,
5 accountants, bookkeepers, employees, representatives, or anyone else acting on your behalf.
6

7 B. You are requested to produce all writings which are responsive to any of the following
8 numbered requests by delivering copies of all such writings on or before the thirtieth day following
9 the date of service of this request (or the next business day if that day falls on a Saturday, Sunday or
10 court holiday) to plaintiff's address above.
11

12 C. All writings which are responsive in whole or in part to any of the following numbered
13 requests shall be produced in full, without abridgment, abbreviation or expurgation of any sort. If any
14 such writings cannot be produced in full, produce the writing to the extent possible and indicate in
15 your written response what portion of the document is not produced and why it could not be
16 produced.
17

18 D. The term "writing" as used in this request for identification and production is a broadly
19 inclusive term referring to any and all written or other graphic material, however produced or
20 reproduced, of every kind and description and to everything upon which sounds, words, symbols or
21 pictures are recorded or depicted by magnetic or electrical impulse, photography, or otherwise. The
22 term "writing" includes, by way of example and not limitation, the following and anything similar to
23 any of the following:
24

25 1. Letters, telegrams, telexes, cables, TXWs, memoranda, interoffice correspondence,
26 emails, text messages, direct messages (DMs) via social media and other such forms of
27 correspondence and written communication;
28

1 writing; and

2 4. State the names and capacities of all persons to whom the document was circulated or its
3 contents communicated.

4 DEFINITIONS

5 (1) As used herein, the words "person" or "persons" shall refer to any natural person, firm,
6 corporation, unincorporated association, partnership or other form of legal entity or governmental
7 body, including its agent and representatives.

8 (2) As used herein, the term "communication" means any transmission of information from
9 one person or entity to another, including (without limitation) by personal meeting, conference,
10 conversation, telephone, radio, telegraph, electronic mail, teleconference, or any other method of
11 communication or by any medium.

12 (3) As used herein, the word "you" and "your" means Vanessa Valdes, and any and all
13 representatives, subsidiaries, affiliates, employees, accountants, attorneys, or agents, and all other
14 persons or entities which at any time have acted or are acting on its behalf or at its request to the
15 matters as alleged in the operative complaint on file in this action.

16 (4) As used herein, "pertaining to" means pertaining to, concerning, regarding, connected
17 with, referencing, or in any other fashion having relationship to.

18 (5) As used herein, "all" means any and all.

19 (6) As used herein, "any" means any and all.

20 (7) As used herein, "document" or "documents" include, but are not limited to, the
21 following items within your possession, custody or control and/or that of your attorneys,
22 agents or other persons acting, or purporting to act, on your behalf whether such items are typed,
23 printed, recorded, reproduced by any mechanical process, copies or written by and; contracts;
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1 communications; correspondence; telegrams; memoranda; statements; records; reports; books;
2 summaries; diaries; forecasts; orders; bills; invoices; checks; statistical statements; studies; graphs;
3 charts; indices; data sheets; data processing cards; analytical records; computer disks, flash-drives or
4 other computer formats; minutes and/or records of meetings and conferences; reports and/or
5 summaries of negotiations; brochures; lists; periodicals; pamphlets; circulars; trade letters; newspaper
6 clippings; press releases; notes; drafts of documents; copies; marginal notations; photographs;
7 drawings; tape recordings; letters; and all other written, printed, recorded, transcribed or graphic
8 matter or sound reproductions, however produced or reproduced.
9

10 SPECIAL INTERROGATORIES

- 11 1. How many points, badges, and/or other benefits have you received on Facebook, Instagram,
12 and/or dating apps, including, but not limited to: "Are We Dating The Same Guy? / Los
13 Angeles"? ("AWDTSG/LA"), Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya,
14 Upward?
15
- 16 2. How many points, badges, and/or other benefits have you received on Facebook, Instagram,
17 and/or dating apps, including, but not limited to: AWDTSG/LA, Matchgroup, Hinge, Tinder,
18 OkCupid, Bumble, Raya, Upward?
19
- 20 3. State the full name(s), address(es), telephone number(s), email address(es) and any and all
21 other contact information of the person(s) from whom you obtained points, badges, and/or
22 other benefits from Facebook, Instagram, and/or dating apps, including, but not limited to:
23 AWDTSG/LA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.
24
- 25 4. What is the value and/or benefit of the points earned from Facebook, Instagram, and/or dating
26 apps, including, but not limited to: AWDTSG/LA, Matchgroup, Hinge, Tinder, OkCupid,
27 Bumble, Raya, Upward?
28

- 1 5. What is the criteria and/or standard that determines why one receives points from on
2 Facebook, Instagram, and/or dating apps, including, but not limited to: AWDTSO/LA,
3 Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward?
- 4 6. Have you earned points, been a top contributor, administrator, moderator and/or earned a
5 badge on Facebook, Instagram, and/or dating apps, including, but not limited to:
6 AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward?
- 7 7. Did you ever approve comments and/or postings on Facebook, Instagram, and/or dating apps,
8 including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid, Bumble,
9 Raya, Upward?
- 10 8. How much time and resources have you devoted to contributing to Facebook, Instagram,
11 and/or dating apps, including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder,
12 OkCupid, Bumble, Raya, Upward?
- 13 9. Have you ever received any compensation, credit(s), benefit(s), monetary payment(s), crypto
14 currency(ies), service(s) from any person(s) for your efforts and/or services on Facebook,
15 Instagram, and/or dating apps, including, but not limited to: AWDTSO/LA, Matchgroup,
16 Hinge, Tinder, OkCupid, Bumble, Raya, Upward?
- 17 10. What is your criteria and/or formula for keeping women safe from electronic harassment,
18 cyberbullying, gang-stalking and/or defamation on Facebook, Instagram, and/or dating apps,
19 including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid, Bumble,
20 Raya, Upward?
- 21 11. Why were all of your postings and comments about plaintiff in the Facebook group
22 AWDTSO/LA deleted?
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- 1 12. Who deleted all of your postings and comments about plaintiff in the Facebook group
2 AWDTSGLA?
- 3 13. When were all of your postings and comments about plaintiff in the Facebook group
4 AWDTSGLA deleted?
- 5 14. How many reports and/or complaints about men have you submitted to third parties,
6 including, but not limited to Facebook, Instagram, and/or dating apps, including, but not
7 limited to: AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward?
- 8 15. How many reports and/or complaints have you submitted to third parties including, but not
9 limited to Facebook, Instagram, and/or dating apps, including, but not limited to:
10 AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward?
- 11 16. Have you ever worked for Meta, Inc., Facebook, Instagram, and/or any dating apps,
12 including, but not limited to: AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble,
13 Raya, Upward?
- 14 17. Have you ever worked and/or currently work for any governmental agency?
- 15 18. What was your reply to the comment about plaintiff that was deleted in the Facebook group
16 AWDTSGLA?
- 17 19. What was the comment about plaintiff that was deleted and to which you replied in the
18 Facebook group AWDTSGLA?
- 19 20. How did you discover the Facebook group AWDTSGLA?
- 20 21. When did you become a member of the Facebook group AWDTSGLA?
- 21 22. State the full name(s), address(es), telephone number(s), email address(es) and any and all
22 other contact information of the person(s) who started the Facebook groups wherein plaintiff
23 is mentioned, including, but not limited to AWDTSGLA.
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- 1 23. Identify the electronic devices (smartphones, labtop/notebooks, desktop computers, ipads,
2 etc.) that you used to post comments about plaintiff on Facebook, Instagram, and/or dating
3 apps, including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid,
4 Bumble, Raya, Upward.
- 5 24. State the complete contact information: full name(s), address(es), telephone number(s), email
6 address(es), etc. of each of the defendants of this lawsuit, each of the Facebook accounts that
7 allegedly also cyberbullied and gang-stalked plaintiff and the Facebook administrators,
8 moderators, et al. person(s) who held positions of authority (e.g. who decided who could or
9 could not join Meta company groups) in said Facebook groups.
- 10 25. Have you had any real-world contact i.e. contact outside of online Facebook communications
11 with any of the defendants of this lawsuit, the other Facebook accounts that allegedly
12 cyberbullied and gang-stalked plaintiff and/or the administrators, moderators, person(s) who
13 held positions of authority (e.g. who decided who could or could not join Meta company
14 groups)?
- 15 26. State the complete contact information: full name(s), address(es), telephone number(s), email
16 address(es), etc. of each of male members of the Facebook group AWDTSO/LA.
- 17 27. How many postings did you publish about plaintiff on Facebook, Instagram, and/or dating
18 apps, including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid,
19 Bumble, Raya, Upward?
- 20 28. How many postings did you publish about plaintiff on Facebook, Instagram, and/or dating
21 apps, including, but not limited to: AWDTSO/LA, Matchgroup, Hinge, Tinder, OkCupid,
22 Bumble, Raya, Upward that you then deleted?
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1 29. Have you ever participated in electronic harassment, cyberbullying, gang-stalking and
2 defamation?

3 30. State the complete contact information: full name(s), address(es), telephone number(s), email
4 address(es), etc. of each of male members on Facebook, Instagram, and/or dating apps,
5 including, but not limited to: AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble,
6 Raya, Upward who you recommended women date.
7

8
9 Date: 2 January 2024

10 By: 

11 Dr. Stewart Lucas Murrey
12 1217 Wilshire Blvd. # 3655
13 Santa Monica, CA 90403
14 Tel.: (424) 278-3017
15 Email: 2@lucasmurrey.io
16 Websites: sickoscoop.com/lucas,
17 lucasmurrey.com

18 Plaintiff & Plaintiff In Pro Per
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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 2 January 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Special Interrogatories:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

By Mail: XXX.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.


By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:

_____.

By Email: ____.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 2 January 2024

By: 
Eliot Wenik

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Websites: sickoscoop.com/lucas, lucasmurrey.com

Plaintiff & Plaintiff In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STANLEY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an
individual;

Plaintiff,

Vs.

Kelly Gibbons a.k.a. Kel Culb Gib, et al.;

Defendants.

Case No. 23STCV14890

**PLAINTIFF DR. MURREY'S REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT VANESSA VALDES**

Dept.: 61

Complaint Filed: 27 June 2023
Hon. Gregory Keosian

Propounding Party: Plaintiff Dr. Murrey

Responding Party: Defendant Vanessa Valdes

SET NO.: One

To DEFENDANT VANESSA VALDES:

Pursuant to Code of Civil Procedure § 2031, Plaintiff Dr. Murrey requests that Defendant Vanessa Valdes respond in writing under oath, to this Request for Production of Documents and that Valdes produce within thirty (30) days of service hereof at the address Dr. Stewart Lucas Murrey, 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403, Tel.: (424) 278-3017 and Email address: 2@lucasmurrey.io, for inspection and copying, the documents designated below which are in the

1 possession, custody and control of Defendant or in the possession, custody or control of her agents,
2 attorneys, employees or representatives.

3 In responding and producing documents pursuant to this request, Valdes is required to furnish
4 all information and writings in the possession of her agents, employees, attorneys or representatives
5 and all other persons acting on her behalf and at her request, and not only such document as are in her
6 immediate possession.
7

8 Any comment or notation appearing on any document requested herein which is not a part of
9 the original text and any draft or preliminary form of any document requested herein is to be
10 considered a separate document and is to be separately produced.
11

12 If any document falling within a category of documents identified in this request is withheld
13 on any basis, such as a claim of privilege or work product, Valdes is to identify each document by
14 providing the following information:

- 15 1. Its nature and brief description of its subject matter;
- 16 2. Its title and any date appearing thereon;
- 17 3. The date it was prepared;
- 18 4. The identities of all persons (other than clerical personnel) responsible for its preparation;
- 19 5. The identities of all persons who signed it;
- 20 6. The number of pages;
- 21 7. The name, employer and position of each addressee or recipient thereof; and
- 22 8. The name and address of the present (or last known) custodian thereof.

23 The identification must be sufficient to enable the document to be identified in any
24 subsequent motion which may be brought to compel its production and/or challenge the assertion of
25 any such privilege.
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1 Further, pursuant to California Code of Civil Procedure § 2031, Valdes is further requested,
2 and required, to submit within thirty (30) days after service of this request, a separate written
3 response, subscribed by Valdes under oath, identifying the documents and tangible things within
4 Valdes' possession, custody or control. The identified documents or tangible things shall bear the
5 same number and be in the same sequence as the responding category in the request and shall be
6 accompanied by a statement that complies with California Code of Civil Procedure § 2031.210. A
7 representation of inability to comply requires an affirmation that a diligent search and a reasonable
8 inquiry has been made, and must specify the reason for inability to comply, and the name and
9 addresses of any person believed to have possession or control of that item or category of item. An
10 objection to compliance requires identification of the objectionable item with particularity, and the
11 specific grounds for the objection, including the particular nature of any privilege invoked.
12

13
14 Failure to timely respond, absent written confirmation of an extension, may result in a waiver
15 of objections and a motion to compel with sanctions.

16 **DEFINITIONS**

- 17
18 (a) The term "subject incident" shall mean and refer to the circumstances and events surrounding
19 the alleged underlying accident, injury or other occurrence giving rise to this action as alleged
20 in the Complaint filed herein.
- 21 (b) The term "you" or "your" shall mean and refer to Vanessa Valdes and her agents, employees,
22 attorneys, accountants, investigators, insurance companies, their agents and employees, and
23 anyone else acting on said party's behalf.
- 24 (c) The term "document" refers to any writing, as defined in Evidence Code §250, and this
25 includes the original or a copy of handwriting, typewriting, printing, photostating,
26 photographing, photocopying, transmitting by electronic mail or facsimile, and every other
27
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1 means of recording upon any tangible thing and form of communication or representation,
2 including letters, words, pictures, sounds or symbols or combinations thereof, and any record
3 thereby created, regardless of the manner in which the record has been stored. To be clear,
4 this also includes the original and all copies of any written material, including by way of
5 description and not limitation, the following items, whether written, printed, produced by
6 hand, recorded, stored, or reproduced by any electrical or mechanical process; agreements;
7 contracts; communications; letters; correspondence; memos; emails; telegrams; telexes; texts;
8 text messages; memoranda; notebooks; computer disks; CD ROMs; DVDs; computer
9 software; computer programs; computer files; summaries of records of telephone
10 conversations; summaries of records of personal conversations and of interview; diaries;
11 minutes or records of meetings; minutes or records of conferences; lists of persons attending
12 meetings or conferences; reports and/or summaries of negotiations; original or preliminary
13 notes; marginal comments appearing on any documents; stenographic or stenotype notes;
14 tapes and voice recordings; working papers; drafts; indexes; data processing cards; ledgers;
15 journals; balance sheets; accounts; invoices; purchase orders; receipts; billings; files; films'
16 trip tickets' expense vouchers; instructions; and other message or writing.

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20 (d) The term "complaint" refers to the operative complaint that Plaintiff filed in the Superior
21 Court of the County of Los Angeles – Stanely Mosk Courthouse, State of California, in the
22 action assigned with case no. 23STCV14890.

23 **REQUESTS FOR PRODUCTION**

24 **REQUEST FOR PRODUCTION NO. 1:**

25
26 Any and all documents and/or information of you protecting women.

27 **REQUEST FOR PRODUCTION NO. 2:**

1 Any and all documents and/or information of Facebook, Instagram, and/or to dating apps,
2 including, but not limited to: "Are We Dating The Same Guy? / Los Angeles"? ("AWDTSG/LA"),
3 Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward protecting women.

4 **REQUEST FOR PRODUCTION NO. 3:**

5 Any and all reports and/or complaints of plaintiff that you have made to any and all third
6 parties, including, but not limited to Facebook, Instagram, and/or to dating apps, including, but not
7 limited to: AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.
8

9 **REQUEST FOR PRODUCTION NO. 4:**

10 Any and all documents and/or information of crimes plaintiff committed.
11

12 **REQUEST FOR PRODUCTION NO. 5:**

13 Any and all documents and/or information of your credentials to determine who can and
14 cannot date, socialize and/or initiate and enjoy romantic relationships.

15 **REQUEST FOR PRODUCTION NO. 6:**

16 Any and all texts, images, postings and/or electronic communications that you have approved
17 on Facebook, Instagram, and/or dating apps, including, but not limited to: AWDTSGLA,
18 Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.
19

20 **REQUEST FOR PRODUCTION NO. 7:**

21 Any and all documents, contracts and/or information of rewards, benefits, compensation,
22 including, but not limited to points, badges, money, etc. that you have received on Facebook,
23 Instagram, and/or dating apps, including, but not limited to AWDTSGLA, Matchgroup, Hinge,
24 Tinder, OkCupid, Bumble, Raya, Upward.
25

26 **REQUEST FOR PRODUCTION NO. 8:**

1 Any and all documents and/or information of your position(s) of authority on Facebook,
2 Instagram, and/or dating apps, including, but not limited to: AWDTSGLA, Matchgroup, Hinge,
3 Tinder, OkCupid, Bumble, Raya, Upward.

4 **REQUEST FOR PRODUCTION NO. 9:**

5 Your reply to the comment about plaintiff that was deleted in the Facebook group
6 AWDTSGLA.

7 **REQUEST FOR PRODUCTION NO. 10:**

8 The comment about plaintiff in to which you replied which was deleted in the Facebook
9 group AWDTSGLA.

10 **REQUEST FOR PRODUCTION NO. 11:**

11 Any and all documents and/or information of posts you made on behalf of anonymous
12 persons on Facebook, Instagram, and/or dating apps, including, but not limited to: AWDTSGLA,
13 Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

14 **REQUEST FOR PRODUCTION NO. 12:**

15 Any and all documents and/or information of male members in the Facebook group: "Are We
16 Dating The Same Guy? / Los Angeles"?

17 **REQUEST FOR PRODUCTION NO. 13:**

18 Any and all reports and/or complaints of men that you have made to any and all third parties,
19 including, but not limited to Facebook, Instagram, and/or dating apps, including, but not limited to:
20 AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

21 **REQUEST FOR PRODUCTION NO. 14:**

1 Any and all reports and/or complaints that you have made to any and all third parties,
2 including, but not limited to Facebook, Instagram, and/or dating apps, including, but not limited to:
3 AWDTS/LA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

4 **REQUEST FOR PRODUCTION NO. 15:**

5 Any and all documents and/or information of you harming men.

6
7 Date: 2 January 2024

8
9 By: 

10 Dr. Stewart Lucas Murrey
11 1217 Wilshire Blvd. #3655
12 Santa Monica, CA 90403
13 Tel.: (424) 278-3017
14 Email: 2@lucasmurrey.io
15 Websites: sickoscoop.com/lucas,
16 lucasmurrey.com

17 Plaintiff & Plaintiff In Pro Per

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 2 January 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Requests for Production of Documents:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

By Mail: _XXX_.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:
_____.

By Email: ____.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 2 January 2024

By: 

Eliot Wenik

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Websites: sickoscoop.com/lucas, lucasmurrey.com

Plaintiff & Plaintiff In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STANELY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an
individual;

Plaintiff,

Vs.

Kelly Gibbons a.k.a. Kel Culb Gib, et al.;

Defendants.

Case No. 23STCV14890

**PLAINTIFF DR. MURREY'S REQUESTS
FOR ADMISSION TO DEFENDANT
VANESSA VALDES**

Dept.: 61

Complaint Filed: 27 June 2023
Hon. Gregory Keosian

Propounding Party: Plaintiff Dr. Murrey

Responding Party: Defendant Vanessa Valdes

SET NO.: One

To DEFENDANT VANESSA VALDES:

Pursuant to California Code of Civil Procedure §2030.010, Plaintiff Dr. Murrey, the
"Propounding Party", hereby requests that Defendant Vanessa Valdes, the "Responding Party",
respond to the following Requests for Admission separately and fully in writing and under oath.

In responding to these Requests for Admissions, furnish all information available to you,
including information in the possession of your attorney or investigators for your attorney, not merely
such information as is known of your personal knowledge. If you fail to comply with the provisions

1 of Code of Civil Procedure § 2033.010 with respect to this Request of Admissions, each of the
2 matters of which an admission is requested will be deemed admitted.

3 REQUESTS

4 REQUEST FOR ADMISSION NO. 1:

5 Admit that you swiped to match with plaintiff on the dating app Hinge because you were
6 attracted to him.
7

8 REQUEST FOR ADMISSION NO. 2:

9 Admit that after matching with plaintiff on Hinge he immediately made it clear to you that he
10 was not interested in dating you.
11

12 REQUEST FOR ADMISSION NO. 3:

13 Admit that after matching with plaintiff on Hinge he immediately texted you: "I wish you
14 well in your search good luck".

15 REQUEST FOR ADMISSION NO. 4:

16 Admit that you have never spoken to plaintiff.
17

18 REQUEST FOR ADMISSION NO. 5:

19 Admit that you have never met plaintiff in person.

20 REQUEST FOR ADMISSION NO. 6:

21 Admit that you reported plaintiff to Hinge wherein you suggested that plaintiff wanted to set
22 you on fire and/or murder you.
23

24 REQUEST FOR ADMISSION NO. 7:

25 Admit that you posted images of plaintiff, his mobile number and his texts without plaintiff's
26 consent in the Facebook group "Are We Dating The Same Guy? / Los Angeles" ("AWDTSG/LA").

27 REQUEST FOR ADMISSION NO. 8:
28

1 Admit that you never informed plaintiff of the existence of said Facebook group
2 AWDTSGLA.

3 REQUEST FOR ADMISSION NO. 9:

4 Admit that you knew that plaintiff was and continues to be unable to join the Facebook group
5 AWDTSGLA to defend himself and his good name.

6 REQUEST FOR ADMISSION NO. 10:

7 Admit that you received points in the Facebook group AWDTSGLA wherein you
8 commented on plaintiff.

9 REQUEST FOR ADMISSION NO. 11:

10 Admit that you received points on Facebook, Instagram, and/or dating apps, including, but not
11 limited to: AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

12 REQUEST FOR ADMISSION NO. 12:

13 Admit that all your comments about plaintiff in the Facebook group AWDTSGLA have been
14 deleted.

15 REQUEST FOR ADMISSION NO. 13:

16 Admit that you posted Facebook accounts emojis: "thumbs up" and "screaming horror face"
17 in support of other Facebook "black hand" emoji postings made by Facebook accounts Charlotte
18 Hannah and Paige Cone signifying your mafia conspiracy to severely harm and/or murder plaintiff
19 and his reputation.

20 REQUEST FOR ADMISSION NO. 14:

21 Admit that you violated the rules of public safety, electronic harassment, cyberbullying, gang-
22 stalking and defamation on Facebook, Instagram, and/or dating apps, including, but not limited to:
23 AWDTSGLA, Matchgroup, Hinge, Tinder, OkCupid, Bumble, Raya, Upward.

1 REQUEST FOR ADMISSION NO. 15:

2 Admit that you have participated in electronic harassment, cyberbullying, gang-stalking and
3 defamation of third parties such as plaintiff.
4

5 Date: 2 January 2024

6 By: 

7 Dr. Stewart Lucas Murrey
8 1217 Wilshire Blvd. #3655
9 Santa Monica, CA 90403
10 Tel.: (424) 278-3017
11 Email: 2@lucasmurrey.io
12 Websites: sickoscoop.com/lucas,
13 lucasmurrey.com

14 Plaintiff & Plaintiff In Pro Per
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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 2 January 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Requests for Admission:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

By Mail: XXX.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:

By Email: ____.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 2 January 2024


By: 
Eliot Wenik

EXHIBIT 21

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Websites: sickoscoop.com/lucas,
lucasmurrey.com

7 February 2024

Via Mail and Email (Sent as a Scanned Copy of the Signed Document) to:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

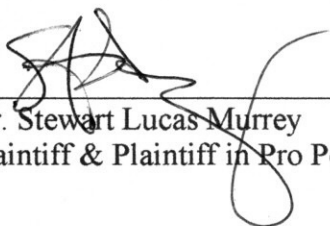
Re: Dr. Stewart Lucas Murrey v. Kelly Gibbons, et al.
Case No. 23STCV14890

**Defendant Ms. Valdes Failure to Respond to Dr. Murrey's Form Interrogatories,
Special Interrogatories, Requests for Admisisions and Requests for Production of
Documents**

Dear Ms. Valdes,

This is a courtesy letter informing you have failed to timely respond to the Form Interrogatories, Special Interrogatories, Requests for Production of Documents and Requests for Admission with which you have been served. Therefore, you have waived all objections to said discovery, including claims of privilege and "work product" protection (Code of Civ. Proc. § 2030.290, subd. (a), 2031.300, subd. (a); see *Leach v. Superior Court* (1980) 111 Cal.App.3d 902, 905-906). Further, if a party to whom discovery was directed fails to serve a timely response, the propounding party may move for an order compelling responses and for a monetary sanction (Code of Civ. Proc. § 2030.290, subd. (b) (Interrogatories), Code of Civ. Proc. § 2031.300, subd. (b) (Document demands)).

Please provide complete and thorough responses without any objections to the discovery that I have propounded on you on or before 17 February 2024, or I will be forced to seek Court intervention and any and all appropriate sanctions.



Dr. Stewart Lucas Murrey
Plaintiff & Plaintiff in Pro Per

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 7 February 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Meet & Confer re: Defendant Valdes' Failure to Respond to Form and Special Interrogatories and Requests for Admissions and Production of Documents:

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

By Mail: XXX.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

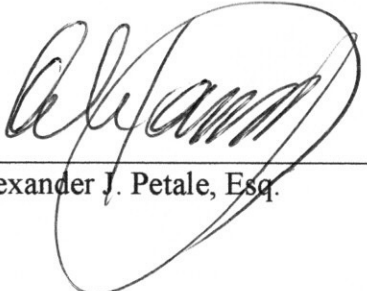
By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above-described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:

By Email: _____.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 7 February 2024

By: 

Alexander J. Petale, Esq.

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 26 March 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's Opposition to Valdes' anti-SLAPP Motion to strike complaint and Declaration of Dr. Murrey to:

Kelly Gibbons
2121 Crenshaw Blvd.
Los Angeles, CA 90016
Tel.: (803) 360-4816

Michal Ofek
9015 Burton Way # 304
Los Angeles, CA 90048-3737
Tel.: (310) 709-1637
Email: ofek.michal@gmail.com

Olivia (Liv) Burger
8110 W. 83rd St. # 1
Playa Del Rey, CA 90293
(231) 590-6751
Email: oliviaburger08@gmail.com

Vanessa Valdes
1825 Ivar Ave. Apt. 312
Los Angeles, CA 90028
Tel.: (818) 632-9258
Email: vanessav@tcrindustries.com

Amy Blalock
455 Nectar Rd.
Ty Ty, GA 31795
Tel.: (310) 569-6182
Email: amyblalock@gmail.com

By Mail: _XXX_.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers:

_____.

By Email: _XXX_.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 26 March 2024

By: /s/ Alexander J. Petale
Alexander J. Petale, Esq.